Draft Closeout Report For IHSS Group SW-1



December 2003

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Approval received from the U.S. Environmental Protection Agency, Region 8

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Approval letter is contained in the Administrative Record.

December 2003

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ENCLOSURE

Complete Data Set Compact Disc - Pre-accelerated Action and Accelerated Action Data

ACRONYMS

ACM asbestos containing material

AAESP Accelerated Action Ecological Screening Process

AL action level

ALARA As Low As Reasonably Achievable

AOC Area of Concern
AR Administrative Record
ASD Analytical Services Division
BMP best management practice

CAD/ROD Corrective Action Decision/Record of Decision

CDPHE Colorado Department of Public Health and Environment

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CHWA Colorado Hazardous Waste Act

CMS/FS Corrective Measures Study/Feasibility Study

COC contaminant of concern cpm counts per minute

CRA Comprehensive Risk Assessment DOE U.S. Department of Energy

dpm/m² disintegrations per minute per square meter dpm/cm² disintegrations per minute per square centimeter

DQA Data Quality Assessment DQO data quality objective

EPA U.S. Environmental Protection Agency

ER Environmental Restoration

ER RSOP Environmental Restoration RFCA Standard Operating Protocol for Routine Soil

Remediation

ft feet

FY Fiscal Year

HPGe high-purity germanium
HRR Historical Release Report

IA Industrial Area

IASAP Industrial Area Sampling and Analysis Plan

IHSS Individual Hazardous Substance Site

K-H Kaiser-Hill Company, L.L.C. LCS laboratory control sample

LLMW low level radioactive mixed hazardous waste

LLW low level radioactive waste ug/kg micrograms per kilogram ug/L micrograms per liter mg/kg milligrams per kilogram

MS matrix spike

MSD matrix spike duplicate

NA not applicable NCi/g nanocurie per gram

NFAA No Further Accelerated Action NLR No Longer Representative PAC Potential Area of Concern POC Point of Compliance

OPWL Original Process Waste Lines

OU Operable Unit

PARCCS precision, accuracy, representativeness, completeness, comparability and sensitivity

pCi/g picocuries per gram

PCOC potential contaminant of concern

POC Point of Compliance ppb parts per billion ppm parts per million QC quality control

RADMS Remedial Action Decision Management System

RAO remedial action objective

RCRA Resource Conservation and Recovery Act

RFCA Rocky Flats Cleanup Agreement

RFETS Rocky Flats Environmental Technology Site

RFI/RI RCRA Facility Investigation/Remedial Investigation

RIN report identification number

RL reporting limit

RPD relative percent difference

RSOP RFCA Standard Operating Protocol

SAP Sampling and Analysis Plan SBD sample beginning depth SED sample end depth

Site Rocky Flats Environmental Technology Site

SOR sum of ratios

SSRS subsurface soil risk screen
SVOC semivolatile organic compound

SWD Soil Water Database

UBC under building contamination
VOC volatile organic compound
V&V verification and validation
WRW wildlife refuge worker
XRF x-ray fluorescence

EXECUTIVE SUMMARY

This Closeout Report summarizes accelerated action activities conducted at Individual Hazardous Substance Sites (IHSSs) 133.5, the Incinerator Facility, and 133.6, the Concrete Wash Pad. These two IHSSs are part of IHSS Group SW-1, which consists of six other IHSSs or Potential Area of Concern (PAC [133.1, 133.2, 133.3, 133.4, SW-1701, SW-1702, 133.5, and 133.6]) that were previously designated as No Further Accelerated Action (NFAA) sites. Activities were planned and executed in accordance with ER Regulatory Contact Record dated May 1, 2003, and the Environmental Restoration (ER) Rocky Flats Cleanup Agreement (RFCA) Standard Operating Protocol for Routine Soil Remediation (ER RSOP). Notification of the planned characterization and removal activities was provided in ER RSOP Notification #03-09 (DOE, 2003b). This notification was written and approved using RFCA Wildlife Refuge Worker (WRW) and Ecological Receptor Action Levels (ALs) to make remediation decisions (DOE et al., 2003).

Activities were conducted between April 24, 2003 and November 17, 2003, and involved the removal of the Incinerator structure, concrete washout material, fill and ash material, and laboratory debris. Soil characterization activities were also performed to evaluate the risk to human health and environment. Characterization analytical results indicate that all soil concentrations are below the WRW ALs. Results of the data quality assessment (DQA) confirmed that the data collected and used are adequate for decision making.

Removal activities were consistent with and contributed to the ER RSOP overall longterm remedial action objectives (RAOs) for RFETS soil. The removal of concrete items contributed to the protection of human health and the environment, because potential sources of contamination were removed. These actions also minimized the need for longterm maintenance and institutional or engineering controls. In addition, best management practices (BMPs) were used to prevent the spread of contamination (for example, erosion and dust controls). Air monitoring data collected during the accelerated action did not indicate any exceedances.

The subsurface soil risk screen conducted as part of this accelerated action indicates no further accelerated action is required. Ecological receptor exceedances (lead, beryllium, and total uranium) will be evaluated through the Accelerated Action Ecological Screening Process and as part of the Comprehensive Risk Assessment (CRA). There is no groundwater contamination downgradient of the area. However potential upgradient sources of contamination may be present within the Industrial Area (IA) Plume. Groundwater contamination within the IA Plume and any necessary remediation (e.g., groundwater treatment system) will be evaluated in a future decision document.

This IHSS is located in an area considered to be subject to high erosion and landslides in accordance with Figure 1 of Attachment 5 of the RFCA Modification (DOE, et al. 2003). Excavation at the site will continue to be controlled through the Site Soil Disturbance Permit process. Access will be restricted to limit disturbance to newly revegetated areas. Site access and the Soil Disturbance Permit process will remain in place pending implementation of long-term controls.

The presence of radionuclides, metals, volatile organic compounds (VOCs), and semivolatile organic compounds (SVOCs) in soil will be evaluated in the CRA which is part of the Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) and Corrective Measures Study/Feasibility Study (CMS/FS) that will be conducted for the Site. The need for and extent of any more general, long-term stewardship activities will also be evaluated in the RFI/RI and CMS/FS and will be proposed as part of the preferred alternative in the Proposed Plan for the Site. Institutional controls and other long-term stewardship requirements for Rocky Flats will ultimately be contained in the Corrective Action Decision/Record of Decision (CAD/ROD), any post-closure Colorado Hazardous Waste Act (CHWA) permit that may be required, and any post-RFCA agreement.

No long-term stewardship activities are recommended for IHSSs 133.5 and 133.6 beyond the generally applicable Site requirements that may be imposed on this area in the future. Institutional controls that will be used as appropriate for this area include prohibitions on building construction, restrictions on excavation or other soil disturbance, and prohibitions on groundwater pumping in the area of IHSSs 133.5 and 133.6.

This Closeout Report and associated documentation will be retained as part of the Rocky Flats Administrative Record file. The specific long-term stewardship recommendations will also be summarized in the Rocky Flats Long-Term Stewardship Strategy.

Approval of this Closeout Report constitutes regulatory agency concurrence that this IHSS Group is a No Further Accelerated Action (NFAA) site. A NFAA decision is justified based on the following:

- 1) No further accelerated action required by surface soil data;
- 2) No further accelerated action required by the subsurface soil risk screen;
- 3) No further accelerated action required by the stewardship evaluation; and
- 4) No further accelerated action required by As Low As Reasonably Achievable (ALARA) consideration (i.e., no elevated concentrations of radionuclides).

This information and NFAA determination will be documented in the Fiscal Year (FY) 04 Historical Release Report (HRR).



1.0 INTRODUCTION

This closeout report summarizes the accelerated action activities, including characterization, conducted at Individual Hazardous Substance Sites (IHSSs) 133.5 and 133.6, which are part of IHSS Group SW-1 at the Rocky Flats Environmental Technology Site (RFETS or Site) in Golden, Colorado. IHSS Group SW-1 consists of the following IHSS and Potential Area of Concern (PAC) sites:

Table 1
IHSS Group SW-1 IHSS/PAC Sites

(T-1000)	up 5 vv-1 kii55/1 AC 5ftCs
IHSS/PAC	IHSS/PAC Description
IHSS 133.1	Ash Pit 1
IHSS 133.2	Ash Pit 2
IHSS 133.3	Ash Pit 3
IHSS 133.4	Ash Pit 4
PAC SW-1701	Recently Identified Ash Pit (also referred to as TDEM-1)
PAC SW-1702	Recently Identified Ash Pit (also referred to as TDEM-2)
IHSS 133.5	Incinerator Facility
IHSS 133.6	Concrete Wash Pad

The location of IHSS Group SW-1 is shown on Figure 1, and the IHSS and PAC sites are shown on Figure 2.

The six ash pits were previously characterized, and results demonstrated that no further accelerated action (NFAA) was necessary at the ash pits. Results associated with IHSS 133.3 and PAC SW-1701 are presented in the 2001 Annual Update to the Historical Release Report (HRR) (DOE 2001). NFAA approval for IHSS 133.3 and PAC SW-1701 was received on February 14, 2002 (CDPHE, EPA 2002). Results associated with IHSS 133.1, IHSS 133.2, IHSS 133.4, and PAC SW-1702 are presented in the 2003 Annual Update to the HRR (DOE 2003a). NFAA approval for IHSS 133.1, IHSS 133.2, IHSS 133.4, and PAC SW-1702 was received on June 12, 2003 (EPA 2003a). Therefore, this Closeout Report focuses on presenting data and evaluating the NFAA recommendation for IHSS 133.5 and IHSS 133.6.

Characterization and accelerated action activities were planned and executed in accordance with the Buffer Zone Sampling and Analysis Plan (BZSAP; DOE 2002a) and the Environmental Restoration (ER) Rocky Flats Cleanup Agreement (RFCA) Standard Operating Protocol (RSOP) for Routine Soil Remediation (ER RSOP) (DOE 2003b). These activities were initiated after the discovery of the Incinerator (IHSS 133.5) in April 2003 and the regulatory approved removal action at the Concrete Wash Pad (IHSS 133.6). Notification of the planned activities was provided in ER RSOP Notification

#03-09 (DOE 2003c), which was approved by the U.S. Environmental Protection Agency, Region 8 on September 4, 2003 (EPA 2003b).

This report contains the information necessary to demonstrate attainment of cleanup objectives and final closure of IHSS 133.5 and IHSS 133.6, including:

- Site characterization information
 - Description of site characterization activities, and
 - Site characterization data, including data tables and maps;
- Site accelerated action information
 - Description of the accelerated action, including the rationale for the action and map of the target remediation area,
 - Map of the actual remediation area, including bounds of the excavation, and dates and durations of specific remedial activities, and
 - Photographs documenting site characterization, remediation, and reclamation activities;
- Confirmation sampling data, including data tables and location maps, as well as a comparison of the confirmation data to applicable cleanup goals;
- Description of deviations from the ER RSOP;
- Description of the subsurface soil risk screen (SSRS);
- Description of near-term stewardship actions and long-term stewardship recommendations;
- Disposition of wastes;
- Site reclamation;
- Table of No Longer Representative (NLR) locations and sample numbers that have been remediated. These data will be used to mark database records so they are not used in the CRA or other Site analyses; and
- DQA, including comparison of confirmation data with project data quality objectives (DQOs).

Approval of this Closeout Report constitutes regulatory agency concurrence that this IHSS Group is an NFAA site. This information and NFAA determination will be documented in the 2004 Annual Update for the HRR.

2.0 SITE CHARACTERIZATION

Characterization information on IHSSs 133.5 and 133.6 consists of limited historical knowledge and recent analytical data. Historical information for the IHSSs was derived from previous studies (DOE 1992 and 2002a) and is summarized in Sections 2.1 and 2.2. There are no historical analytical data associated with IHSSs 133.5 and 133.6. Accelerated action data are summarized in Sections 2.3. A compact disc that contains the complete accelerated action data set, including quality assurance and quality control data, is enclosed with this report. Sampling specifications, including potential contaminants of concern (PCOCs) and media sampled, are presented in Table 2. Deviations from the sampling specifications are presented and explained in Table 2.

2.1 IHSS 133.5 – Incinerator

The Incinerator was located south of the West Access Road near RFETS original western boundary (Figure 2). It was located on the side of a hill that slopes to the south towards Women Creek. The Incinerator was approximately 24 feet high and constructed of concrete walls (with rebar) on a concrete slab. The slab was approximately 12 feet by 16 feet. The Incinerator was flanked with concrete wing walls. It was in operation from 1952 through August 1968 and was used to burn office wastes. Incinerator operations ceased in 1968 because of deterioration of the fire box and stack, and was partially dismantled in 1971. Records indicate that the area around the Incinerator may have been backfilled with ash (DOE, 1992).

An estimated 100 grams of depleted uranium were burned with the general combustible wastes. Until 1959, the ash and non-combustible material were placed around the Incinerator and near the concrete wash pad.

2.2 IHSS 133.6 - Concrete Wash Pad

The Concrete Wash Pad was adjacent to the former Incinerator (Figure 2). Excess concrete from construction activities on site was routinely washed from concrete trucks from 1953 through March 1979. Potentially contaminated ash generated from the Incinerator may have been deposited in the area of the concrete wash pad.

2.3 Accelerated Action Characterization Data

Characterization soil sampling locations and analytical results for IHSS 133.5 and IHSS 133.6 are presented on Figure 3 and in Table 4. Only results greater than background means plus two standard deviations or detection limits (DLs) are shown. Data indicate that all contaminant concentrations are below Rocky Flats Cleanup Agreement (RFCA) Wildlife Refuge Worker (WRW) Action Levels (ALs).

However, lead, beryllium, and total uranium concentrations exceeded Ecological Receptor ALs at several locations (Figure 3). The majority of the lead exceedances were slightly elevated relative to background (54.62 mg/kg). Only two locations, BI31-007 and BI31-011, reported values (220 mg/kg) that were significantly greater than background. Beryllium concentrations (up to 4.4 mg/kg) slightly exceeded background (0.97 mg/kg) and the Ecological Receptor AL (2.15 mg/kg). Total uranium

concentrations (up to 110 mg/kg) at two locations, BI31-007 and BI31-011, exceeded the Ecological Receptor AL (67.8 mg/kg).

Several samples were also collected for dioxins and furans (Table 2). Because there are no existing RFCA ALs for dioxins and furans or congeners, analytical results were compared to EPA cleanup guidelines (EPA 1998) for residential (1,000 ppt) and industrial use (5,000 ppt). All reported values for dioxins and furans were less than the EPA cleanup benchmark for residential use (1,000 ppt).

The raw data, as of November 19, 2003, are provided on the enclosed compact disc.

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Table 2
IHSS Group SW-1 Accelerated Action Characterization Specifications

IHSS Group	⊢	200 C C C C C C C C C C C C C C C C C C		C	5.173000000000000000000000000000000000000			
	Site	Location Code	Location Easting Northing Media Depth Anal Code Interval Anal	Northing	Media	Depth Interval	Analyte	Laboratory Method
SW-1	IHSS 133.5	B130-000	2079231.78	747510.38	Surface Soil	0-0.5	Metals	6200
		BI30-000	2079231.78	747510.38	Surface Soil	0-0.5	Radionuclides	HPGe
		B130-001	2079326.11	747500.42	Surface Soil	0-0.5	Metals	6200
		BI30-001	2079326.11	747500.42	Surface Soil	0-0.5	Radionuclides	HPGe
		BI30-002	2079361.43	747471.75	Surface Soil	0-0.5	Radionuclides	HPGe
		B130-002	2079361.43	747471.75	Surface Soil	0-0.5	Metals	6010
		BI30-003	2079354.01	747483.50	Surface Soil	0-0.5	Radionuclides	HPGe
		BI30-003	2079354.01	747483.50	Surface Soil	0-0.5	Metals	6010
		BI31-001	2079216.83	747693.72	Subsurface Soil	1-1.5	Metals	6010
		BI31-001	2079216.83	747693.72	Subsurface Soil	1-1.5	Radionuclides	HPGe
		BI31-002	2079226.82	747683.68	Subsurface Soil	1-1.5	Metals	6010
		BI31-002	2079226.82	747683.68	Subsurface Soil	1-1.5	Radionuclides	HPGe
		BI31-003	2079216.83	747673.71	Subsurface Soil	1-1.5	Metals	0109
		BI31-003	2079216.83	747673.71	Subsurface Soil	1-1.5	Radionuclides	HPGe
		BI31-004	2079206.87	747683.69	Subsurface Soil	1-1.5	Metals	6010
		BI31-004	2079206.87	747683.69	Subsurface Soil	1-1.5	Radionuclides	HPGe
		BI31-005	2079305.00	747721.03	Surface Soil	0-0.5	Metals	6200
		BI31-005	2079305.00	747721.03	Surface Soil	0-0.5	VOCs	8260
		BI31-005	2079305.00	747721.03	Surface Soil	0-0.5	SVOCs	8270
		BI31-005	2079305.00	747721.03	Surface Soil	0-0.5	Radionuclides	HPGe
		BI31-006	2079325.46	747711.79	Surface Soil	0-0.5	Metals	6200
		BI31-006	2079325.46	747711.79	Surface Soil	0-0.5	VOCs	8260
		BI31-006	2079325.46	747711.79	Surface Soil	0-0.5	SVOCs	8270
		BI31-006	2079325.46	747711.79	Surface Soil	0-0.5	Radionuclides	HPGe
		B131-007	2079307.50	747701.59	Surface Soil	0-0.5	Metals	6010
		BI31-007	2079307.50	747701.59	Surface Soil	0-0.5	VOCs	8260
		BI31-007	2079307.50	747701.59	Surface Soil	0-0.5	Dioxins/Furans	8290
		BI31-007	2079307.50	747701.59	Surface Soil	0-0.5	Radionuclides	ALPHA SPEC
		BI31-007	2079307.50	747701.59	Surface Soil	0-0.5	Radionuclides	HPGe

IHSS IHSS/PAC/UBC	Location Code	Easting	Northing	Media	Depui Interval	Analyte	Method
Group Site	R131-008	2079314.40	747695.22	Surface Soil	0-0.5	Metals	6010
	B131-008	2079314.40	747695.22	Surface Soil	0-0.5	VOCs	8260
	B131-008	2079314.40	747695.22	Surface Soil	0-0.5	Dioxins/Furans	8290
	B131-008	2079314.40	747695.22	Surface Soil	0-0.5	Radionuclides	HPGe
	BI31-009	2079319.09	747695.10	Subsurface Soil	0.5-1.5	Metals	6010
	B131-009	2079319.09	747695.10	Subsurface Soil	0.5-1.5	VOCs	8260
1	BI31-009	2079319.09	747695.10	Subsurface Soil	0.5-1.5	Dioxins/Furans	8290
_1	BI31-009	2079319.09	747695.10	Subsurface Soil	0.5-1.5	Radionuclides	HPGe
	B131-009-01	2079314.40	747695.22	Surface Soil	0-0.5	Metals	6010
-	B131-009-01	2079314.40	747695.22	Surface Soil	0-0.5	VOCs	8260
	BI31-009-01	2079314.40	747695.22	Surface Soil	0-0.5	Dioxins/Furans	8290
	BI31-009-01	2079314.40	747695.22	Surface Soil	0-0.5	Radionuclides	HPGe
	B131-010	2079322.57	747699.23	Surface Soil	0-0.5	Metals	6010
	B131-010	2079322.57	747699.23	Surface Soil	0-0.5	VOCs	8260
	BI31-010	2079322.57	747699.23	Surface Soil	0-0.5	Dioxins/Furans	8290
	BI31-010	2079322.57	747699.23	Surface Soil	0-0.5	Radionuclides	HPGe
	B131-011	2079335.27	747707.74	Surface Soil	0-0.5	Metals	6010
	B131-011	2079335.27	747707.74	Surface Soil	0-0.5	VOCs	8260
	BI31-011	2079335.27	747707.74	Surface Soil	0-0.5	Dioxins/Furans	8290
	B131-011	2079335.27	747707.74	Surface Soil	0-0.5	Radionuclides	HPGe
	BI31-012	2079306.52	747676.98	Surface Soil	0-0.5	Dioxins/Furans	8290
	BI31-013	2079284.61	747698.93	Surface Soil	0-0.5	Dioxins/Furans	8290
	BI31-015	2079317.51	747713.92	Surface Soil	0-0.5	VOCs	8260
	BI31-015	2079317.51	747713.92	Surface Soil	0-0.5	Radionuclides	HPGe
	RI31-016	2079315.95	747700.01	Surface Soil	0-0.5	VOCs	8260
	BI31-016	2079315.95	747700.01	Surface Soil	0-0.5	Radionuclides	HPGe
	BJ31-000	2079341.11	747598.06	Surface Soil	0-0.5	Metals	6200
	BJ31-000	2079341.11	747598.06	Surface Soil	0-0.5	Radionuclides	HPGe
	BJ31-001	2079383.47	747607.47	Surface Soil	0-0.5	Metals	6200
	BJ31-001	2079383.47			0-0.5	Radionuclides	HPGe
	000	00100100	TO COLUMN	Confess Coil	400	Matale	0069

IHSS/PAC/UBC	Location	Easting	Northing	Media	Depth Interval	Analyte	Laboratory Method
2110	RI31-002	2079365.33	747587.95	Surface Soil	0-0.5	Radionuclides	HPGe
	B131-003	2079346.09	747567.81	Surface Soil	0-0.5	Metals	6200
	B131-003	2079346.09	747567.81	Surface Soil	0-0.5	Radionuclides	HPGe
	B131-004	2079392.53	747578.68	Surface Soil	0-0.5	Metals	6200
	BJ31-004	2079392.53	747578.68	Surface Soil	0-0.5	Radionuclides	HPGe
	BJ31-005	2079361.77	747687.28	Surface Soil	0-0.5	Dioxins/Furans	8290
	BJ31-006	2079349.54	747670.42	Surface Soil	0-0.5	Dioxins/Furans	8290
	BL32-000	2079811.70	747898.19	Surface Soil	0-0.5	Metals	6200
	BL32-000	2079811.70	747898.19	Surface Soil	0-0.5	Radionuclides	HPGe
	BM31-000	2079993.26	747605.80	Surface Soil	0-0.5	Metals	6200
	BM31-000	2079993.26	747605.80	Surface Soil	0-0.5	Radionuclides	HPGe
	BM31-001	2079976.78	747659.45	Surface Soil	0-0.5	Metals	6200
	BM31-001	2079976.78	747659.45	Surface Soil	0-0.5	Radionuclides	HPGe
	BM31-002	2079969.96	747710.75	Surface Soil	0-0.5	Metals	6200
	BM31-002	2079969.96	747710.75	Surface Soil	0-0.5	Radionuclides	HPGe
	BN33-000	2080185.71	747994.07	Surface Soil	0-0.5	Metals	6200
	BN33-000	2080185.71	747994.07	Surface Soil	0-0.5	Radionuclides	HPGe
	INCINERATOR-EAST	2079064.93	747563.13	Surface Soil	0-0.3	Radionuclides	HPGe
	INCINERATOR-EAST	2079064.93	747563.13	Surface Soil	0-0.3	Radionuclides	HPGe
	INCINERATOR-WEST	2079027.28	747565.99	Surface Soil	0-0.3	Radionuclides	ALPHA SPEC
	INCINERATOR-WEST	2079027.28	747565.99	Surface Soil	0-0.3	Radionuclides	HPGe
1HSS 133 6	BH30-000	2079120.40	747470.73	Subsurface Soil	0.5-1	Metals	6010
	BH30-000	2079120.40	747470.73	Subsurface Soil	0.5-1	Radionuclides	HPGe
	BH30-000	2079120.40	747470.73	Surface Soil	0-0.5	Radionuclides	ALPHA SPEC
	BI31-000	2079120.40	747470.73	Subsurface Soil	0.5-2.5	Metals	6010
	B131_000	2079120 40	747470.73	Subsurface Soil	0.5-2.5	Radionuclides	HPGe

Table 3 Deviations From the Characterization Specifications

Location Code	Easting Planned	Northing Planned	Easting Actual	Northing Actual	Comments
	A 11.7 1 - 11.7 81.7 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	DEFECT OF DRESSELS		2010	
BH30-000	2079120.40	747470.73	2079120.40		No deviations
BI30-000	2079231.78	747510.38	2079231.78		No deviations
BI30-001	2079326.11	747500.42	2079326.11	747500.42	No deviations
BI30-002	2079361.43	747471.75	2079361.43	747471.75	No deviations
BI30-003	2079354.01	747483.50	2079354.01	747483.50	No deviations
BI31-000	2079120.40	747470.73	2079120.40	747470.73	No deviations
BI31-001	2079216.83	747693.72	2079216.83	747693.72	No deviations
BI31-002	2079226.82	747683.68	2079226.82	747683.68	No deviations
BI31-003	2079216.83	747673.71	2079216.83	747673.71	No deviations
BI31-004	2079206.87	747683.69	2079206.87	747683.69	No deviations
BI31-005	2079305.00	747721.03	2079305.00	747721.03	No deviations
BI31-006	2079325.46	747711.79	2079325.46	747711.79	No deviations
BI31-007	2079307.50	747701.59	2079307.50	747701.59	No deviations
BI31-008	2079314.40	747695.22	2079314.40	747695.22	No deviations
BI31-009	2079319.09	747695.10	2079319.09	747695.10	No deviations
BI31-009-01	2079314.40	747695.22	2079314.40	747695.22	No deviations
BI31-010	2079322.57	747699.23	2079322.57	747699.23	No deviations
BI31-011	2079335.27	747707.74	2079335.27	747707.74	No deviations
BI31-012	2079306.52	747676.98	2079306.52	747676.98	No deviations
BI31-013	2079284.61	747698.93	2079284.61	747698.93	No deviations
BI31-015	2079317.51	747713.92	2079317.51	747713.92	No deviations
BI31-016	2079315.95	747700.01	2079315.95	747700.01	No deviations
BJ30-000	2079404.03	747470.83	2079404.03	747470.83	No deviations
BJ31-001	2079383.47	747607.47	2079383.47	747607.47	No deviations
BJ31-002	2079365.33	747587.95	2079365.33	747587.95	No deviations
BJ31-003	2079346.09	747567.81	2079346.09	747567.81	No deviations
BJ31-004	2079392.53	747578.68	2079392.53	747578.68	No deviations
BJ31-005	2079361.77	747687.28	2079361.77	747687.28	No deviations
BJ31-006	2079349.54	747670.42	2079349.54	747670.42	No deviations
BJ32-000	2079472.36	747838.52	2079472.36	747838.52	No deviations
BL32-000	2079811.70	747898.19	2079811.70	747898.19	No deviations
BM31-000	2079993.26	747605.80	2079993.26	747605.80	No deviations
BM31-001	2079976.78	747659.45	2079976.78	747659.45	No deviations
BM31-002	2079969.96	747710.75	2079969.96	747710.75	No deviations
BN33-000	2080185.71	747994.07	2080185.71	747994.07	No deviations
INCINERATOR-EAST	2079064.93	747563.13	2079064.93	747563.13	No deviations
NCINERATOR-WEST		747565.99	2079027.28	747565.99	No deviations

THIS TARGET SHEET REPRESENTS AN OVER-SIZED MAP / PLATE FOR THIS DOCUMENT: (Ref: 03-RF-01810; JLB-143-03)

Draft Closeout Report for IHSS Group SW-1 (Incinerator)

December 2003

Figure 3:

Accelerated Action Sampling Locations and Results at IHSS 133.5 and IHSS 133.6

File: w:\projects\fy2004\SW-1\SW-1_clrpt_dcr.apr

November 2003

CERCLA Administrative Record Document, BZ-Z-000646

U.S. DEPARTEMENT OF ENERGY ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

GOLDEN, COLORADO

Table 4
Action Characterization Data for IHSS 133.5 and IHSS 133.6

Location	Analyte	SBD (ft)	SED (ft)	To	Background Mean + 2 SD	Result	WRW Action Level	Ecological Receptor Action Level	Unit
BH30-000	Uranium, Total	0	0.5	5.34	5.98	12.14	2750	67.8	mg/kg
BH30-000		0	0.5	1.80	2.25	4.09	300	1800	pCi/g
BH30-000	Uranium. Total	0.5	-	5.32	3.04	12.82	2750	67.8	mg/kg
BH30-000	1)ranium-234	0.5		1.79	2.64	4.32	300	1800	pCi/g
BH30-000	Uranium-235	0.5	-	0.14	0.12	0.24	8	1900	pCi/g
BH30-000	Uranium-238	0.5	-	1.79	1.49	4.32	351	1600	pCi/g
B130-000	Barium	0	0.5	00.86	141.26	846.00	26400		mg/kg
B130-000	Chromium	0	0.5	20.00	16.99	51.20	268	•	mg/kg
B130-000	Copper	0	0.5	4.00	18.06	49.60	40900		mg/kg
BI30-000	Iron	0	0.5	2190.00	18037.00	33900.00	307000		mg/kg
BI30-000	Lead	0	0.5	7.00	54.62	46.60	1000	25.6	mg/kg
R130-000	Manganese	0	0.5	158.00	365.08	499.00	3480	1	mg/kg
B130-000	Nickel	0	0.5	12.00	14.91	40.80	20400	•	mg/kg
RI30-000	Strontium	0	0.5	20.00	48.94	258.00	613000	1	mg/kg
B130-000	Uranium, Total	0	0.5	6.14	5.98	12.18	2750	8.79	mg/kg
B130-000	Uranium-234	0	0.5	2.07	2.25	4.10	300	1800	pCi/g
B130-000	Uranium-235	0	0.5	0.22	60.0	0.25	8	1900	pCi/g
B130-000	Uranium-238	0	0.5	2.07	2.00	4.10	351	1600	pCi/g
B130-000	Vanadium	0	0.5	31.00	45.59	160.00	7150	433	mg/kg
BI30-000	Zinc	0	0.5	9.00	73.76	116.00	307000	•	mg/kg
BI30-001	Arsenic	0	0.5	5.00	10.09	10.10	22.2	21.6	mg/kg
B130-001	Barium	0	0.5	98.00	141.26	824.00	26400	•	mg/kg
B130-001	Cadmium	0	0.5	3.00	1.61	4.39	962	•	mg/kg
B130-001	Chromium	0	0.5	20.00	16.99	43.70	268	•	mg/kg
B130-001	Copper	0	0.5	4.00	18.06	47.60	40900	1	mg/kg
B130-001	Iron	0	0.5	2190.00	18037.00	30300.00	307000	1	mg/kg
B130-001	Lead	0	0.5	7.00	54.62	74.60	1000	25.6	mg/kg
100 0010			,	00.1	00 376	250 00	2480		mo/ko

Draft Closeout Report for IHSS Group SW-1

5	mg/kg	mg/kg	mg/kg	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg	mg/kg	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg										
Ecological Receptor Action Level	•	-	•	8.79	1800	1900	1600	433	ŧ	•	•	•			-	25.6	•	1	1	•	8.79	1800	1900	1600	433	ı	•	•	25.6	•
WRW Action Level	20400	613000	613000	2750	300	8	351	7150	307000	228000	26400	268	1550	40900	307000	1000	20400	3480	20400	613000	2750	300	8	351	7150	307000	268	40900	1000	20400
Result	36.20	308.00	6.43	15.74	5.30	0.41	5.30	144.00	168.00	22000.00	190.00	26.00	11.00	30.00	19000.00	39.00	16.00	430.00	18.00	88.00	34.24	11.53	0.38	11.53	53.00	160.00	20.00	86.00	37.00	12.00
Background Mean + 2 SD	14.91	48.94	2.90	5.98	2.25	60.0	2.00	45.59	73.76	16902.00	141.26	16.99	10.91	18.06	18037.00	54.62	11.55	365.08	14.91	48.94	5.98	2.25	60.0	2.00	45.59	73.76	16.99	18.06	54.62	11.55
d	12.00	20.00	4.00	5.68	1.91	0.21	1.91	31.00	9.00	5.30	0.40	0.17	0.20	0.05	1.50	0.30	0.53	0.19	0.21	90.0	4.81	1.62	0.17	1.62	0.51	0.50	0.16	0.05	0.29	0.52
SED (ft)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
SBD (ft)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Analyte	Nickel	Strontium	Tin	Uranium. Total	Uranium-234	Uranium-235	Uranium-238	Vanadium	Zinc	Aluminum	Barium	Chromium	Cobalt	Copper	Iron	Lead	Lithium	Manganese	Nickel	Strontium	Uranium, Total	Uranium-234	Uranium-235	Uranium-238	Vanadium	Zinc	Chromium	Copper	Lead	Lithium
Location	R130-001	B130-001	R130-001	BI30-001	RI30-001	R130-001	B130-001	B130-001	B130-001	B130-002	B130-002	B130-002	BI30-002	BI30-002	BI30-002	R130-002	BI30-002	B130-002	R130-002	RI30-002	R130-002	B130-002	B130-002	B130-002	B130-002	B130-002	B130-003	B130-003	BI30-003	B130-003

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3	mg/kg	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg	pCi/g	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg												
Receptor Action Level	ı	8.79	1800	1900	1600	433	67.8	1800	8.79	1800	1900	1600	8.79	1800	1900	1600	8.7.9	1800	1900	1600	67.8	1800	1900	1600	25.6	8.79	1800	1900	1600	67.8
WRW Action Level	613000	2750	300	8	351	7150	2750	300	2750	300	8	351	2750	300	8	351	2750	300	8	351	2750	300	8	351	1000	2750	300	8	351	2750
Result	94.00	25.27	8.51	0.17	8.51	48.00	14.11	4.75	11.09	3.73	0.27	3.73	12.54	4.22	0.25	4.22	11.88	4.00	0.18	4.00	12.11	4.08	0.19	4.08	32.00	16.87	5.68	0.30	5.68	14.20
Background Mean + 2 SD	48.94	5.98	2.25	0.00	2.00	45.59	5.98	2.25	3.04	2.64	0.12	1.49	5.98	2.25	60.0	2.00	3.04	2.64	0.12	1.49	5.98	2.25	60'0	2.00	24.97	3.04	2.64	0.12	1.49	5 98
đ	90.0	1.58	0.53	0.10	0.53	0.49	5.36	1.81	6.47	2.18	0.15	2.18	4.74	1.59	0.14	1.59	5.81	1.96	0.16	1.96	5.36	1.81	0.14	1.81	0.18	5.98	2.01	0.17	2.01	7 65
SED (ft)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	2.5	2.5	2.5	2.5	0.5	0.5	0.5	0.5	1.5	1.5	1.5	1.5	0.5	0.5	0.5	0.5	1.5	1.5	1.5	1.5	1.5	20
SBD (ft)	0	0	0	0	0	0	0	0	0.5	0.5	0.5	0.5	0	0	0	0	1	_	-	-	0	0	0	0	-	-	_	-	-	0
Analyte	Strontium	Uranium, Total	Uranium-234	Uranium-235	Uranium-238	Vanadium	Uranium. Total	Uranium-234	Uranium, Total	Uranium-234	Uranium-235	Uranium-238	Uranium, Total	Uranium-234	Uranium-235	Uranium-238	Uranium, Total	Uranium-234	Uranium-235	Uranium-238	Uranium, Total	Uranium-234	Uranium-235	Uranium-238	Lead	Uranium, Total		Uranium-235	Uranium-238	I lucations Total
Location	B130-003	B130-003	B130-003	B130-003	B130-003	BI30-003	B131-000	B131-000	B131-000	B131-000	BI31-000	B131-000	BI31-001	BI31-001	B131-001	BI31-001	BI31-001	BI31-001	BI31-001	BI31-001	BI31-002	B131-002	BI31-002	BI31-002	BI31-002	B131-002	BI31-002	BI31-002	BI31-002	200 1510

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5	pCi/g	pCi/g	pCi/g	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg	pCi/g	pCi/g	mg/kg	mg/kg	mg/kg	ug/kg	ug/kg	mg/kg	ug/kg	mg/kg	ug/kg	mg/kg	mg/kg	mg/kg	ug/kg	mg/kg	mg/kg
Receptor Action Level	1800	1900	1600	8.79	1800	1900	1600	67.8	1800	1900	1600	25.6	67.8	1900	1600	1	21.6	•	800000	1010000	\$		•	•	•	25.6	•	•	1	8.79
WRW Action Level	300	8	351	2750	300	8	351	2750	300	8	351	1000	2750	8	351	409	22.2	26400	34900	34900	268	3490000	40900	27200000	307000	1000	20400	22100000	613000	2750
Result	4.78	0.21	4.78	11.56	3.89	0.23	3.89	10.97	3.70	0.17	3.70	31.00	7.63	0.17	2.57	7.19	11.00	533.00	67.00	80.00	42.80	73.00	30.50	140.00	33100.00	26.70	39.80	100.00	153.00	11.74
Background Mean + 2 SD	2.25	60.0	2.00	3.04	2.64	0.12	1.49	5.98	2.25	60.0	2.00	24.97	3.04	0.12	1.49	0.47	10.09	141.26	N/A	N/A	16.99	N/A	18.06	N/A	18037.00	54.62	14.91	N/A	48.94	\$ 98
B	1.57	0.17	1.57	4.84	1 63	0 10	1.63	4.68	1.58	0.13	1.58	0.16	5.39	0.12	1.81	7.00	5.00	98.00	44.00	72.00	20.00	39.00	4.00	44.00	2190.00	7.00	12.00	64.00	20.00	5 16
SED (ft)	0.5	0.5	0.5	1.5	1.5	٠, ١	1.5	0.5	0.5	0.5	0.5	1.5	1.5	1.5	1.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	40
SBD (ft)	0		0	, -	-	-	-	0	0	0	0	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Analyte	1 Iranium-234	I Iranium-235	Tranium-238	I Iranium Total	Ulanium, 19tai	Tranium 235	Uranium-238	Uranium Total	Ulranium-234	Uranium-235	Uranium-238	Lead	I Iranium Total	Uranium-235	Uranium-238	Antimony	Arsenic	Rarium	Renzo(a)anthracene	Benzo(h)fluoranthene	Chromium	Chrysene	Copper	Fluoranthene	Iron	Lead	Nickel	Pyrene	Strontium	11
Location	D121 003	5001510	B131-003	B131-003	B151-005	B131-003	B131-003	B131-003	D131-004	DI31-004	B131-004	B131-004	B131-004	B131-004	B131-004	B131-005	B131-005	D121 005	B131-005	B131-005	B131-005	R131-005	B131-005	B131-005	B131-005	B131-005	B131-005	B131-005	B131-005	200 1010

Analyte	SBD SED (ft)		THE NEW OFF	Background Mean + 2 SD	Result	WRW Action Level	Ecological Receptor Action Level	\$
	0 0.5	5 1.74	4	2.25	3.95	300	1800	pCi/g
	0 0.5	5 0.15	5	60.0	0.21	8	1900	pCi/g
	0 0.5	5 1.74	4	2.00	3.95	351	1600	pCi/g
	0 0.5	5 31.00	00	45.59	134.00	7150	433	mg/kg
	0 0.5	5 9.00	0	73.76	09.06	307000		mg/kg
	0 0.5	5 5.00	00	10.09	18.20	22.2	21.6	mg/kg
	0 0.5	5 98.00	00	141.26	592.00	26400	•	mg/kg
-	0 0.5	5 20.00	00	16.99	48.70	268	7	mg/kg
	0 0.5	5 4.00	00	18.06	29.60	40900	1	mg/kg
-	0 0.5	5 2190.00	00.0	18037.00	40600.00	307000	•	mg/kg
	0 0.5	5 7.00	00	54.62	33.40	1000	25.6	mg/kg
	0 0.5	5 12.00	00	14.91	52.40	20400	•	mg/kg
	0 0.5	5 20.00	00	48.94	166.00	613000	•	mg/kg
	0 0.5	5 4.73	73	5.98	9.01	2750	67.8	mg/kg
	0 0.5	5 1.59	69	2.25	3.03	300	1800	pCi/g
-	0 0.5	5 0.12	12	60.0	0.22	8	1900	pCi/g
	0.0	0.5 1.59	69	2.00	3.03	351	1600	pCi/g
-	0 0	0.5 31.00	00	45.59	146.00	7150	433	mg/kg
Г	0	0.5 4.80	80	16902.00	18000.00	228000	•	mg/kg
	0 0	0.5 0.28	28	0.47	3.40	409	-	mg/kg
	0	0.5 0.36	36	141.26	180.00	26400	•	mg/kg
	0 0	0.5 6.00	00	N/A	1.40	205000	1	ug/kg
	0	0.5 0.10	01	0.97	3.20	921	2.15	mg/kg
	0 0	0.5 0.06	90	1.61	34.00	962	ŧ	mg/kg
	0 0	0.5 0.15	15	66.91	39.00	268	-	mg/kg
Г	0 0	0.5 0.05	05	18.06	240.00	40900	1	mg/kg
	0	0.5 0.2	0.26	54.62	220.00	1000	25.6	mg/kg
	0	0.5 0.4	0.48	11.55	16.00	20400	1	mg/kg
	0	0.5 0.	0.19	14.91	28.00	20400	-	mg/kg
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Çme	mg/kg	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	pCi/g	pCi/g	mg/kg							
Receptor Action Level	-	8.79	1800	1900	1600	433		•	1	•	-	-	•	25.6	•			•	1	67.8	1800	1600	433		1	•	•	1	25.6	,
WRW Action Level	613000	2750	300	8	351	7150	307000	409	26400	962	268	40900	307000	1000	3480	20400	5110	613000	613000	2750	300	351	7150	307000	26400	268	40900	307000	1000	3480
Result	4.29	29.70	10.00	0.31	10.00	145.00	133.00	7.25	00.699	3.29	46.10	78.60	30900.00	53.70	655.00	32.30	2.06	271.00	5.29	14.85	5.00	5.00	84.90	196.00	719.00	35.60	70.30	33900.00	49.50	578.00
Background Mean + 2 SD	2.90	5.98	2.25	60.0	2.00	45.59	73.76	0.47	141.26	1.61	16.99	18.06	18037.00	54.62	365.08	14.91	1.22	48.94	2.90	5.98	2.25	2.00	45.59	73.76	141.26	16.99	18.06	18037.00	54.62	365.08
Z	4.00	5.71	1.92	0.20	1.92	31.00	9.00	7.00	00.86	3.00	20.00	4.00	2190.00	7.00	158.00	12.00	1.00	20.00	4.00	5.61	1.89	1.89	31.00	9.00	00.86	20.00	4.00	2190.00	7.00	158.00
SED (ft)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
SBD (ft)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Analyte	Tin	Uranium. Total	Uranium-234	Uranium-235	Uranium-238	Vanadium	Zinc	Antimony	Barium	Cadmium	Chromium	Copper	Iron	Lead	Manganese	Nickel	Selenium	Strontium	Tin	Uranium, Total	Uranium-234	Uranium-238	Vanadium	Zinc	Barium	Chromium	Copper	Iron	Lead	Manganese
Location	B130-000	B130-000	B130-000	B130-000	B130-000	B.130-000	B.130-000	B131-000	BJ31-000	BJ31-000	BJ31-000	B131-000	BJ31-000	BJ31-000	BJ31-000	BJ31-000	BJ31-000	BJ31-000	BJ31-001	BJ31-001	BJ31-001	BJ31-001	BJ31-001	R131-001						

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ğ	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	pCi/g	pCi/g	pCi/g	mg/kg	mg/kg									
Receptor Action Level	8.79	1800	1900	1600	433	•	4		•	•	25.6	,	t	1	,	8.79	1800	1900	1600	433	ą.	,	21.6	1	1	•	•	25.6	1	1
WRW Action Level	2750	300	8	351	7150	307000	26400	268	40900	307000	1000	3480	20400	613000	613000	2750	300	8	351	7150	307000	409	22.2	26400	268	40900	307000	1000	3480	20400
Result	17.82	00.9	0.30	00.9	130.00	151.00	745.00	56.90	95.40	36700.00	30.50	513.00	39.90	232.00	4.21	11.88	4.00	0.30	4.00	112.00	114.00	7.29	12.90	836.00	43.30	55.50	29100.00	82.10	567.00	33.70
Background Mean + 2 SD	5.98	2.25	60.0	2.00	45.59	73.76	141.26	16.99	18.06	18037.00	54.62	365.08	14.91	48.94	2.90	5.98	2.25	0.09	2.00	45.59	73.76	0.47	10.09	141.26	16.99	18.06	18037.00	54.62	365.08	14.91
a	5.44	1 83	0 18	1 83	31 00	00 6	00.86	20.00	4.00	2190.00	7.00	158.00	12.00	20.00	4.00	6:39	2.15	0.17	2.15	31.00	9.00	7.00	5.00	98.00	20.00	4.00	2190.00	7.00	158.00	12 00
SED (ft)	0.5	5 0	5.0	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
SBD (ft)	C			0				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Analyte	Ilronium Total	Ulanium, 19ta	Uranium-234	Uranium 238	Vramum-230	Vallacium	ZINC	Chromium	Copper	Iron	Lead	Manganese	Nickel	Strontium	Tin	Uranium Total		1 Iranium-235	I Iranium-738	Vanadium	Zinc	Antimony	Arsenic	Barium	Chromium	Conner	Iron	Lead	Manganese	Nichal
Location	7001110	BJ31-003	BJ31-003	BJ31-003	BJ31-003	BJ31-003	BJ31-003	BJ31-004	BJ31-004	DJ31-004	DJ31-004	B131-004	B131-004	B131-004	B131-004	B131_004	B131-004	DJ21-004	D131-004	DJ31-004	DJ31-004	DJ31-004	B132-000	B132_000	B132-000	D132-000	B132-000	D332-000	B132-000	222-200

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SBD (ff)
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Location	Analyte	SBD (ft)	SED (ft)	B	Background Mean + 2 SD	Result	WRW Action Level	Ecological Receptor Action Level	Unit
BM31-000	Tin	0	0.5	4.00	2.90	7.53	613000	-	mg/kg
BM31-000	Uranium Total	0	0.5	3.95	5.98	8.32	2750	8.79	mg/kg
BM31-000	Uranium-234	0	0.5	1.33	2.25	2.80	300	1800	pCi/g
BM31-000	Uranium-235	0	0.5	0.17	60.0	0.28	8	1900	pCi/g
BM31-000	Uranium-238	0	0.5	1.33	2.00	2.80	351	1600	pCi/g
BM31-000	Vanadium	0	0.5	31.00	45.59	112.00	7150	433	mg/kg
BM31-000	Zinc	0	0.5	9.00	73.76	169.00	307000	1	mg/kg
BM31-001	Barium	0	0.5	98.00	141.26	556.00	26400	ā	mg/kg
BM31-001	Chromium	0	0.5	20.00	66.91	46.40	268	1	mg/kg
BM31-001	Copper	0	0.5	4.00	18.06	32.20	40900	ŧ	mg/kg
BM31-001	Iron	0	0.5	2190.00	18037.00	26300.00	307000		mg/kg
BM31-001	Lead	0	0.5	7.00	54.62	44.10	1000	25.6	mg/kg
BM31-001	Manganese	0	0.5	158.00	365.08	296.00	3480		mg/kg
BM31-001	Nickel	0	0.5	12.00	14.91	30.00	20400	•	mg/kg
BM31-001	Strontium	0	0.5	20.00	48.94	180.00	613000	1	mg/kg
BM31-001	Tin	0	0.5	4.00	2.90	4.75	613000	1	mg/kg
BM31-001	Uranium, Total	0	0.5	6.47	5.98	16.31	2750	67.8	mg/kg
RM31-001	Uranium-234	0	0.5	2.18	2.25	6.50	300	1800	pCi/g
BM31-001	Uranium-235	0	0.5	0.22	60.0	0.44	8	1900	pCi/g
BM31-001	Uranium-238	0	0.5	2.18	2.00	6.50	351	1600	pCi/g
BM31-001	Vanadium	0	0.5	31.00	45.59	167.00	7150	433	mg/kg
BM31-001	Zinc	0	0.5	9.00	73.76	109.00	307000	1	mg/kg
BM31-002	Arsenic	0	0.5	5.00	10.09	10.70	22.2	21.6	mg/kg
BM31-002	Barium	0	0.5	98.00	141.26	727.00	26400	1	mg/kg
BM31-002	Chromium	0	0.5	20.00	16.99	35.90	268	,	mg/kg
BM31-002	Copper	0	0.5	4.00	18.06	08.99	40900	1	mg/kg
BM31-002	Iron	0	0.5	2190.00	18037.00	31800.00	307000	ı	mg/kg
BM31-002	Lead	0	0.5	7.00	54.62	87.80	1000	25.6	mg/kg
BM31-002	Manganese	0	0.5	158.00	365.08	736.00	3480	•	mg/kg
RM31-002	Nichel	c	0.5	12.00	14.91	40.90	20400	1	mg/kg

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Selenium 0 0.5 Strontium 0 0.5 Uranium-234 0 0.5 Uranium-234 0 0.5 Uranium-238 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Arsenic 0 0.5 Chromium 0 0.5 Chromium 0 0.5 Iron 0 0.5 Copper 0 0.5 Iron 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Varadium 0 0.5 Uranium-234 0 0.5 Uranium, Total 0 0.3 Uranium, Total					Action Level	
Strontium 0 0.5 Uranium, Total 0 0.5 Uranium-234 0 0.5 Uranium-238 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Arsenic 0 0.5 Arsenic 0 0.5 Arsenic 0 0.5 Chromium 0 0.5 Iron 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Varontium 0 0.5 Uranium-234 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3		1.22	1.71	5110	1	mg/kg
Uranium, Total 0 0.5 Uranium-234 0 0.5 Uranium-238 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Arsenic 0 0.5 Arsenic 0 0.5 Barium 0 0.5 Chromium 0 0.5 Iron 0 0.5 Nickel 0 0.5 Nickel 0 0.5 Varanium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3		48.94	213.00	613000	ł	mg/kg
Uranium-234 0 0.5 Uranium-235 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Arsenic 0 0.5 Barium 0 0.5 Chromium 0 0.5 Iron 0 0.5 Lead 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Nickel 0 0.5 Varanium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 14.71	5.98	16.34	2750	8.79	mg/kg
Uranium-235 0 0.5 Vanadium 0 0.5 Vanadium 0 0.5 Arsenic 0 0.5 Arsenic 0 0.5 Arsenic 0 0.5 Barium 0 0.5 Chromium 0 0.5 Iron 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Nickel 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 4.95	2.25	5.50	300	1800	pCi/g
Uranium-238 0 0.5 Vanadium 0 0.5 Arsenic 0 0.5 Arsenic 0 0.5 Barium 0 0.5 Chromium 0 0.5 Iron 0 0.5 Iron 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 0.31	60.0	0.33	8	1900	pCi/g
Vanadium 0 0.5 Zinc 0 0.5 Arsenic 0 0.5 Barium 0 0.5 Chromium 0 0.5 Iron 0 0.5 Lead 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Varanium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 4.95	2.00	5.50	351	1600	pCi/g
Zinc 0 0.5 Arsenic 0 0.5 Barium 0 0.5 Chromium 0 0.5 Lead 0 0.5 Iron 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Varanium, Total 0 0.5 Uranium-234 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 31.00	45.59	186.00	7150	433	mg/kg
Arsenic 0 0.5 Barium 0 0.5 Chromium 0 0.5 Copper 0 0.5 Iron 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Strontium 0 0.5 Uranium-234 0 0.5 Vanadium 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 9.00	73.76	406.00	307000	1	mg/kg
Barium 0 0.5 Chromium 0 0.5 Lead 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Strontium 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3	5 5.00	10.09	15.70	22.2	21.6	mg/kg
Chromium 0 0.5 Copper 0 0.5 Lead 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Strontium 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3	5 98.00	141.26	766.00	26400	-	mg/kg
Copper 0 0.5 Lead 0 0.5 Manganese 0 0.5 Mickel 0 0.5 Strontium 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3	5 20.00	16.99	37.10	268	1	mg/kg
Iron 0 0.5 Lead 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Strontium 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.5 Vanadium 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 4.00	18.06	59.80	40900	•	mg/kg
Lead 0 0.5 Manganese 0 0.5 Nickel 0 0.5 Strontium 0 0.5 Uranium, Total 0 0.5 Uranium-234 0 0.5 Vanadium 0 0.5 Uranium, Total 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 2190.00	18037.00	35200.00	307000	ı	mg/kg
Manganese 0 0.5 Nickel 0 0.5 Strontium 0 0.5 Uranium, Total 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Zinc 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 7.00	54.62	47.40	1000	25.6	mg/kg
Nickel 0 0.5 Strontium 0 0.5 Uranium, Total 0 0.5 Uranium-234 0 0.5 Vanadium 0 0.5 Zinc 0 0.5 Uranium, Total 0 0.3 Uranium-234 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 158.00	365.08	458.00	3480	•	mg/kg
Strontium 0 0.5 Uranium, Total 0 0.5 Uranium-234 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Zinc 0 0.5 Uranium, Total 0 0.3 Uranium-234 0 0.3 Uranium, Total 0 0.3	5 12.00	14.91	48.50	20400	P	mg/kg
Uranium, Total 0 0.5 Uranium-234 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Zinc 0 0.5 Uranium, Total 0 0.3 Uranium, Total 0 0.3 Uranium, Total 0 0.3	5 20.00	48.94	175.00	613000	•	mg/kg
Uranium-234 0 0.5 Uranium-238 0 0.5 Vanadium 0 0.5 Zinc 0 0.5 Uranium, Total 0 0.3 Uranium-234 0 0.3 Uranium, Total 0 0.3	5 4.64	5.98	10.99	2750	67.8	mg/kg
Uranium-238 0 0.5 Vanadium 0 0.5 Zinc 0 0.5 Uranium, Total 0 0.3 Uranium-234 0 0.3 Uranium, Total 0 0.3	5 1.56	2.25	3.70	300	1800	pCi/g
Vanadium 0 0.5 Zinc 0 0.5 Uranium, Total 0 0.3 Uranium-234 0 0.3 Uranium, Total 0 0.3	5 1.56	2.00	3.70	351	1600	pCi/g
Zinc 0 0.5 Uranium, Total 0 0.3 Uranium-234 0 0.3 Uranium, Total 0 0.3	5 31.00	45.59	167.00	7150	433	mg/kg
Uranium, Total 0 0.3 Uranium-234 0 0.3 Uranium, Total 0 0.3	5 9.00	73.76	90.30	307000	1	mg/kg
Uranium-234 0 0.3 Uranium, Total 0 0.3	3 6.57	5.98	15.30	2750	8.79	mg/kg
Uranium, Total 0 0.3	3 2.21	2.25	5.15	300	1800	pCi/g
	3 5.17	5.98	16.62	2750	67.8	mg/kg
INCINERATOR-WEST Uranium-234 0 0.3	3 0.24	2.25	7.39	300	1800	pCi/g
Uranium-235 0 0.3	3 0.15	60.0	0.45	8	1900	pCi/g
0 0.3	.3 0.20	2.00	3.27	351	1600	pCi/g

Bold Type Denotes AL Exceedance

SBD – Soil Begin Depth SED – Soil End Depth DL– Detection Limit

2.4 Sums of Ratios and Area of Concern

RFCA sums of ratios (SORs) were calculated for the IHSS 133.5 and IHSS 133.6 sampling locations based on the characterization analytical data for the radionuclides of concern and the WRW ALs. Plutonium-239/240 activities are derived from the americium-241 activities [i.e., Pu-239/240 = (Am-241 gamma spectroscopy concentration x 8.08) + 3.24]. Table 5 presents the SORs for surface and subsurface soil. SORs were calculated for all locations with analytical results greater than background means plus two standard deviations or DLs. All SORs for radionuclides in surface and subsurface soil are less than 1.

Table 5
RFCA Sums of Ratios Based on Radionuclide Concentrations

Sums of Ratios Based of Location Code	Surface Soil SOR	Subsurface Soil SOR
D1120 000	0.01	0.06
BH30-000	0.01	No Data
BI30-000	0.06	No Data
BI30-001	0.08	No Data
BI30-002	0.12	No Data
BI30-003		0.06
BI31-000	0.02	0.06
BI31-001		
BI31-002	0.05	0.07
BI31-003	0.06	0.03
BI31-004		
BI31-005	0.05	No Data
BI31-006	0.05	No Data
BI31-007	0.15	No Data
BI31-008	0.06	No Data
BI31-009-01	0.05	0.05
BI31-009	No Data	0.05
BI31-010	0.05	No Data
BI31-011	0.11	No Data
BI31-015	0.02	No Data
BI31-016	0.06	No Data
BJ30-000	0.10	No Data
BJ31-000	0.03	No Data
BJ31-001	0.09	No Data
BJ31-002	0.06	No Data
BJ31-003	0.07	No Data
BJ31-004	0.06	No Data
BJ32-000	0.05	No Data
BL32-000	0.03	No Data
BM31-000	0.05	No Data
BM31-001	0.10	No Data
BM31-002	0.08	No Data
BN33-000	0.02	No Data
INCINERATOR-EAST	0.02	No Data
INCINERATOR-WEST	0.11	No Data

The Area of Concern (AOC), shown on Figure 4, was determined based on characterization analytical results. The AOC is defined as the area with any contaminant concentration greater than the background mean plus two standard deviations or DL.

3.0 ACCELERATED ACTION

Accelerated action objectives were developed for the Incinerator and Concrete Wash Pad, and described in ER RSOP Notification #03-09 (DOE 2003c). ER RSOP remedial action objectives (RAOs) include the following:

- 1. Provide a remedy consistent with the RFETS goal of protection of human health and the environment:
- 2. Provide a remedy that minimizes the need for long-term maintenance and institutional or engineering controls; and
- 3. Minimize the spread of contaminants during implementation of accelerated actions.

The accelerated action remediation goals for the Incinerator included the following:

- Remove the Incinerator and recycle in accordance with the RSOP for Recycling Concrete (DOE 2003d) or dispose at an appropriate facility. The concrete wing walls and footings were anticipated to be left in place unless they had to be removed to remove the Incinerator.
- Remove soil with non-radionuclide or uranium contaminant concentrations greater than the RFCA WRW ALs to a depth of 6 inches. If soil contamination greater than ALs extends 6 inches in depth, perform a SSRS.
- Consult with regulatory agencies if contaminant are greater than the ecological receptor ALs but less than the WRW ALs.
- If contaminated soil is removed, collect confirmation soil samples in accordance with the BZSAP (DOE 2002a).

Accelerated action activities were conducted between April 28, 2003, and November 17, 2003. Start and end dates of significant activities are listed in Table 6. Key components removed during the accelerated action are shown in Figure 5. Photographs of site activities are provided in Appendix A.

Table 6
Dates of Accelerated Action Activities for IHSS 133.5

Activity	Start Date	End Date	Duration
Characterization Sampling	April 24, 2003	November 17, 2003	203 Days
Removal Activities	October 28, 2003	November 12, 2003	16 Days
Backfill Excavations	November 12, 2003	November 14, 2003	3 Days
Reseed	December 2003 ¹	December 2003	1 Day

Planned activity not performed to date.

3.1 Removal Activities

All accelerated action objectives were achieved. Removal activities are described below.

ER RSOP Notification #03-09 (DOE 2003c) accelerated action project objectives for IHSS 133.5-Incinerator were achieved through the following:

- The IHSS 133.5 Incinerator was removed:
- Soot-covered concrete rubble, concrete slabs, potential asbestos containing material, two drum carcasses, ash-like material, and clean fill were removed;
- LLW and low level radioactive mixed hazardous waste (LLMW) removed;
- ACM was removed;
- Clean soil was removed from the Incinerator; and
- Characterization samples were collected in accordance with the BZSAP (DOE 2002a) to verify that COC concentrations were less than the WRW ALs.

These removal activities are described below.

Remove Concrete Slabs from the Concrete Wash Area

Clean concrete was removed from the Concrete Wash Area as a Best Management Practice. This removal action was not considered an accelerated action because the concrete was not contaminated. The concrete which was up to five feet thick in some places, was broken up using a hydraulic hammer, and the concrete was recycled in accordance with the RSOP for Recycling Concrete (DOE 2003d). The concrete pieces were turned over and surveyed to determine if radionuclide contamination was present. Approximately 3,000 cubic yards (cy) of concrete debris was taken from the adjacent area and sent to the Building 850 recycle pile. Concrete disposal is described in Section 10. Soil samples were collected after removal of the excess concrete to characterize the IHSS.

Removal of Incinerator Structure: Spring 2003 Activities

On April 24th, during concrete removal at IHSS 133.5, the southern face of the Incinerator was exposed enough to be identified. The Incinerator was hidden by backfill along the north, east and west sides of the structure. The roof of the Incinerator had been buried by about a foot of soil, and about half the roof area was exposed. Field radiological surveys of part of the outside surfaces of the Incinerator and the equipment were less than free release criteria of 1,000 dpm/100 cm² (removable).

Additional radiological surveys of the exposed Incinerator sides and roof were performed on Monday, April 26, 2003. A slightly elevated area was found on the roof near the former location of the Incinerator stack. Activities at this area were detectable but well below free-release criteria 1,000 dpm/100 cm² (removable).

ACM covering the roof of the Incinerator was encountered during excavation activities. Sampling and analysis confirmed that the roofing material contained 20 percent ACM. This material was deemed as LLW and is being prepared for offsite shipment.

Laboratory debris with elevated beta radiation was discovered approximately 300 feet south of the Incinerator on May 1, 2003. The HRR for the area describes that noncombustible glassware and trash was collected in a nearby dumpster, so this type of material was not unexpected. The immediate area where the trash was found was posted as a radioactive material area, and the material was removed and disposed as waste. The lab debris was bagged and placed into two strong-tight metal boxes. One box was classified as LLW, and the second container was classified as mixed LLW/hazardous waste. Both waste containers were prepared for offsite shipment.

Removal activities were postponed in May 2003 to evaluate the acquired data and to develop a comprehensive plan to disposition the Incinerator (DOE 2003c).

Removal of Incinerator Structure: Fall 2003 Activities

Removal of the Incinerator resumed on October 24, 2003. The Incinerator roof, walls and wing walls were removed and broken into pieces using a Hitachi 330LC. The foundation slabs were broken up using a hydraulic hammer. During removal activities soot covered concrete rubble was found at an approximate depth of 2.5 feet. Additional concrete slabs below the Incinerator roof were broken up and disposed as LLW. Two drum carcasses were found at the base of the Incinerator. The carcasses were disposed as LLW along with the concrete.

Rebar, refractory metal, and some metal debris was also associated with the Incinerator concrete but was not segregated from the concrete. One hundred eight cubic yards of this material was classified as LLMW and is currently being stored pending shipment. Final disposition is pending waste characterization results. Approximately 15 cy of sanitary waste was generated. In addition, approximately 90 cy of uncontaminated concrete rubble from the area surrounding the Incinerator was sent to the Building 850 recycle pile.

Three concrete structures remain: the footer under the northern wall, and the two caissons that were located under the Incinerator where the southern wing walls joined this structure. None of these remaining structures were in contact with ash, and all are greater than 3 feet below grade after final regrading.

During removal of the contaminated concrete located south of the Incinerator in November 2003, a small area with broken glass and other small debris was discovered along with some ash-like material. Elevated radiological counts were associated with both the ash and the debris. This material was removed from the area and placed in a waste container for shipment offsite. A radiological survey of the soil after removal indicated that all contaminated material had been removed. A sample was collected from the soils where the removal occurred and analyzed for and metals. The results verified no AL exceedances.

Soil Remediation and Site Reclamation

Soil within excavations was sampled and analytical results indicated that contaminant concentrations in soil were less than RFCA WRW ALs (Section 2.3). Therefore, no additional soil was removed. Excavations were backfilled, and the area was graded and will be seeded (Section 11.0). Documentation regarding approval to backfill is provided in an ER Regulatory Contact Record dated November 12, 2003 (Appendix B). Approximately 100 cubic yards of Rocky Flats Alluvium was brought from the (unused) New Landfill Area to the project site.

4.0 CONFIRMATION SAMPLING

Because results from accelerated action sampling indicate that contaminant concentrations were less than the RFCA WRW ALs, no soil was removed, and confirmation sampling was not conducted.

5.0 RCRA UNIT CLOSURE

The Incinerator was never regulated under RCRA, and therefore, IHSS 133.5 and 133.6 are not subject to RCRA closure requirements.

6.0 SUBSURFACE SOIL RISK SCREEN

Current site conditions are evaluated to determine if remediation is required by the SSRS outlined in Figure 3 of Attachment 5 of the RFCA Modifications (DOE, et al. 2003).

Screen 1 – Are COC concentrations below Table 3 Soil Action Levels (ALs) for the Wildlife Refuge Worker (WRW)?

Available analytical data, collected before and after incinerator and soil removal, for radionuclides, metals and VOCs indicate that these COC concentrations are below WRW ALs.

Screen 2 – Is there a potential for subsurface soil to become surface soil (landslide and erosion areas identified on Figure 1)?

IHSS 133.5 is located in an area prone to landslides and high erosion as identified on Attachment 5 - Figure 1 of the RFCA Modifications. However, current data does not indicate analytical results above WRW ALs (RFCA Modifications [DOE, et al. 2003]). The excavation from the Incinerator removal was backfilled with soil, compacted, and regraded to a slope of 3:1, which should minimize slumping or erosion.

Screen 3 – Does Subsurface soil contamination for radionuclides exceed criteria defined in Section 5.3 and Attachment 14?

Current characterization data do not indicate that radionuclides exceed their ALs in IHSS 133.5 and IHSS 133.6 as defined in Section 5.3. Attachment 14 pertains to contaminated

soil associated with reported or suspected OPWL leaks and associated valve vaults, which does not apply to IHSS 133.5 and IHSS 133.6.

Screen 4 – Is there an environmental pathway and sufficient quantity of COCs that would cause an exceedance of the Surface Water Standards?

Contaminant migration via erosion and groundwater are the two possible pathways whereby surface water could become contaminated from IHSS Group SW-1. Contaminant concentrations were reduced by the removal of the Incinerator and soil. The nearest surface water is Woman Creek, which is located approximately 400 feet south of IHSS 133.5 (Figure 1). However, the potential for erosion as a pathway is unlikely given that the site has been regraded and will be seeded with native plants and grasses.

Groundwater is another possible pathway whereby surface water could become contaminated by IHSS Group SW-1, thus groundwater data has been assessed. Available analytical data for surface and subsurface soil suggests that uranium is the only contaminant with potential to migrate to surface water from IHSS Group SW-1 via groundwater.

The nearest downgradient groundwater well (ID: 62593) is located approximately 150 feet southeast of IHSS 133.5. The most recent sampling data for this well is from July 1993 and May 1995. Analytical results from both sampling events indicate that all uranium isotopes are below RFCA Tier II ALs for groundwater.

In addition, uranium is not a contaminant that exceeds surface water ALs in Woman Creek, and as such, IHSS 133.5 does not appear to be impacting surface water quality. Furthermore, recent water quality data at downgradient station SW027 (surface water point of evaluation [POE]) indicate these contaminants were less than RFCA surface water ALs (DOE 2003e).

Screen 5 – Are COC concentrations below the Table 3 Soil Action Levels for ecological receptors?

Some metals, including lead, beryllium, and total uranium, exceed Ecological Receptor ALs at several locations (see Section 2.3). However, the observed exceedances are only slightly elevated relative the Ecological Receptors and given the regrading and reseeding, potential exposure to ecological receptors should be minimized. Exceedances will be further evaluated in the AAESP.

7.0 STEWARDSHIP ANALYSIS

The IHSSs 133.5 and 133.6 stewardship evaluation was conducted through ongoing consultation with the regulatory agencies. Frequent informal project updates, e-mails, and telephone and personal contact occurred throughout the project. Documentation associated with these contacts is provided in Appendix B.

7.1 Current Site Conditions

As discussed in Section 3.1, accelerated actions at IHSSs 133.5 and 133.6 consisted of excavation of the Incinerator and the miscellaneous concrete south of the Incinerator. Based on the accelerated action, the following conditions exist at IHSSs 133.5 and 133.6:

- Potential sources of contamination that existed in IHSSs 133.5 and 133.6 (that is, the Incinerator and the miscellaneous concrete) were removed.
- Surface and subsurface contaminant concentrations in soil are greater than background means plus two standard deviations or DLs throughout IHSSs 133.5 and 133.6.
- Contaminant concentrations are below RFCA WRW ALs. However, samples at several locations exceed Ecological Receptor ALs for lead, beryllium, and total uranium.
- The site was covered with approximately 6 inches of backfill and will be revegetated.

7.2 Near-Term Management Recommendations

Because residual contaminant concentrations are low and potential contaminant sources were removed, mitigated, or found not to have existed, no specific near-term management techniques are required. Potential contaminant sources and pathways have been removed. Contaminant concentrations in soil remaining at IHSSs 133.5 and 133.6 do not trigger any further accelerated action. Near-term recommendations include the following:

- Excavation at the site will continue to be controlled through the Site Soil Disturbance Permit process.
- Access will be restricted to minimize disturbance to newly revegetated areas.
- Site access and the Soil Disturbance Permit process will remain in place pending implementation of long-term controls.

7.3 Long-Term Stewardship Recommendations

Based on remaining environmental conditions at IHSSs 133.5 and 133.6, no specific long-term stewardship activities are recommended beyond the generally applicable Site requirements. These requirements may be imposed on this area in the future. Institutional controls that will be used as appropriate for this area include the following:

- Restrictions on excavation or other soil disturbance; and
- Prohibitions on groundwater pumping in the area of IHSSs 133.5 and 133.6.

No specific engineered controls or environmental monitoring are recommended as a result of the conditions remaining at IHSSs 133.5 and 133.6. Likewise, no specific institutional or physical controls are recommended as a result of the conditions remaining at IHSSs 133.5 and 133.6.

This Closeout Report and associated documentation will be retained as part of the Rocky Flats Administrative Record file. The specific long-term stewardship recommendations will also be summarized in the Rocky Flats Long-Term Stewardship Strategy.

IHSSs 133.5 and 133.6 will be evaluated as part of the Sitewide CRA, which is part of the RFI/RI and CMS/FS that will be conducted for the Site. The need for and extent of any more general, long-term stewardship activities will also be evaluated in the RFI/RI and CMS/FS and will be proposed as part of the preferred alternative in the Proposed Plan for the Site. Institutional controls and other long-term stewardship requirements for Rocky Flats will ultimately be contained in the CAD/ROD, any post-closure CHWA permit that may be required, and any post-RFCA agreement.

8.0 DEVIATIONS FROM THE ER RSOP

Removal methods and objectives did not deviate from ER RSOP Notification #03-09 (DOE, 2003b).

9.0 POST-ACCELERATED ACTION CONDITIONS

The Incinerator slab and foundation walls were removed. Sampling results from the soil beneath the items removed indicate that all contaminant concentrations are less than the proposed RFCA WRW ALs. Sampling results from other locations in the IHSSs also indicate that all contaminant concentrations are less than the proposed RFCA WRW AL.

The presence of residual contamination was determined based on pre-accelerated action and accelerated action characterization. Pre-accelerated action characterization indicates no contaminant concentrations in surface or subsurface soil greater than the proposed RFCA WRW ALs. Accelerated action characterization indicates no contaminant concentrations in surface or subsurface soil greater than the RFCA WRW ALs. Also, exceedances of lead, beryllium, and total uranium concentrations in soil were observed at several locations. Residual soil concentrations greater than background means plus two standard deviations or DLs at IHSSs 133.5 and 133.6 are shown on Figure 6.

SORs, based on the RFCA WRW ALs for radionuclides and pre-accelerated action and accelerated action data, are listed in Table 5 and shown on Figure 7. Plutonium-239/240 activities are derived from the americium-241 activities [i.e., Pu-239/240 = (Am-241 gamma spectroscopy concentration x 8.08) + 3.24]. All SORs for radionuclides in surface and subsurface soil were less than 1.

THIS TARGET SHEET REPRESENTS AN OVER-SIZED MAP / PLATE FOR THIS DOCUMENT:

(Ref: 03-RF-01810; JLB-143-03)

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December 2003

Figure 6:

Residual Contamination at IHSS Group SW-1

File: w:\projects\fy2004\SW-1\SW-1 clrpt dcr_2.apr

November 2003

CERCLA Administrative Record Document, BZ-Z-000646

U.S. DEPARTEMENT OF ENERGY ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

GOLDEN, COLORADO

10.0 WASTE MANAGEMENT

Waste from the IHSS Group SW-1 accelerated action consisted of concrete, laboratory debris, and ash material. One hundred eighty seven cubic yards of concrete and laboratory debris were classified as LLW and placed in intermodal containers. Fifteen cy of concrete was classified as sanitary waste, placed in dump trucks, and shipped to an off-site (Erie) sanitary landfill. Approximately 90 cy of concrete waste was hauled to the concrete recycling pile on the Building 850 slab. Some ACM was removed from the Incinerator roof and was classified as LLW.

11.0 SITE RECLAMATION

Upon removal of the Incinerator, the final slope of the land surface at and immediately adjacent to the Incinerator was graded to a 3:1 slope using standard earth-moving equipment. This slope is less than the existing slopes of the area surrounding the Incinerator. Erosion from the slopes will be controlled with standard engineering controls, and the slope will also be re-vegetated according to the existing re-vegetation plans in December 2003.

Approximately 300 cubic yards of native soil was brought to the project site and spread over the area. The fill material for the excavations created by the removal of the Incinerator consisted of Rocky Flats alluvium from the New Landfill area. The fill material was placed in approximate 18-inch loose lifts and compacted with several passes of equipment weighing approximately 20,000 pounds, which exerted a foot pressure not less than 6½ pounds per square inch. Compaction was achieved when no visual deflection of the fill was observed by the compaction equipment.

The area was subsequently graded. A mesic seed mix will be spread over the site using broadcast seeding methods. Hydromulch will be applied to conserve moisture and prevent erosion.

12.0 NO LONGER REPRESENTATIVE SAMPLING LOCATIONS

Several sampling locations are identified as no longer representative (NLR). The soil surface associated with each location was disturbed by slab and structural removal activities, placement of backfill, and regrading. These locations are presented in Figure 8.

13.0 DATA QUALITY ASSESSMENT

The Data Quality Objectives (DQOs) for this project are described in the BZSAP (DOE 2002a). All DQOs for this project were achieved based on the following:

- Regulatory agency approved sampling program design (ER Regulatory Contact Record dated May 1, 2003);
- Samples were collected in accordance with the BZSAP(DOE 2002a); and
- Data Quality Assessment was conducted as documented in the following sections.

13.1 Data Quality Assessment Process

The DQA process ensures that the type, quantity and quality of environmental data used in decision making are defensible, and is based on the following guidance and requirements:

- EPA QA/G-4, 1994a, Guidance for the Data Quality Objective Process;
- EPA QA/G-9, 1998, Guidance for the Data Quality Assessment Process; Practical Methods for Data Analysis; and
- DOE Order 414.1A, 1999, Quality Assurance.

Verification and validation (V&V) of the data are the primary components of the DQA. The final data are compared with original project DQOs and evaluated with respect to project decisions; uncertainty within the decisions; and quality criteria required for the data, specifically precision, accuracy, representativeness, completeness, comparability, and sensitivity (PARCCS). Validation criteria are consistent with the following RFETS-specific documents and industry guidelines:

- EPA 540/R-94/012, 1994b, USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review;
- EPA 540/R-94/013, 1994c, USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review; and
- Kaiser-Hill Company, L.L.C.(K-H) V&V Guidelines:
 - General Guidelines for Data Verification and Validation, DA-GR01-v1, 2002a.
 - V&V Guidelines for Isotopic Determinations by Alpha Spectrometry, DA-RC01-v1, 2002b.
 - V&V Guidelines for Volatile Organics, DA-SS01-v1, 2002c.
 - V&V Guidelines for Semivolatile Organics, DA-SS02-v1, 2002d.

- V&V Guidelines for Metals, DA-SS05-v1, 2002e.
- Lockheed-Martin, 1997, Evaluation of Radiochemical Data Usability, ES/ER/MS-5.

This report will be submitted to the Comprehensive Environmental, Response, Compensation and Liability Act (CERCLA) Administrative Record (AR) for permanent storage 30 days after being provided to CDPHE and U.S. EPA.

13.2 Verification and Validation of Results

Verification ensures that data produced and used by the project are documented and traceable in accordance with quality requirements. Validation consists of a technical review of all data that directly support the project decisions so that any limitations of the data relative to project goals are delineated and the associated data are qualified accordingly. The V&V process defines the criteria that constitute data quality, namely PARCCS parameters. Data traceability and archival are also addressed. V&V criteria include the following:

- Chain-of-custody;
- Preservation and hold-times;
- Instrument calibrations:
- Preparation blanks;
- Interference check samples (metals);
- Matrix spikes/matrix spike duplicates (MS/MSD);
- Laboratory control samples (LCS);
- Field duplicate measurements;
- Chemical yield (radiochemistry);
- Required quantitation limits/minimum detectable activities (sensitivity of chemical and radiochemical measurements, respectively); and
- Sample analysis and preparation methods.

Evaluation of V&V criteria ensures that PARCCS parameters are satisfactory (i.e., within tolerances acceptable to the project). Satisfactory V&V of laboratory quality controls are captured through application of validation "flags" or qualifiers to individual records.

Raw hardcopy data (e.g., individual analytical data packages) are currently filed by RIN and are maintained by Kaiser-Hill Analytical Services Division; older hardcopies may reside in the Federal Center in Lakewood, Colorado. Electronic data are stored in the RFETS Soil and Water Database.

The data sets addressed in this report are included on the enclosed compact disc in Microsoft ACCESS 2000 format: (Filename: SW-1_112503.mdb, tables "SWD&LIMS_dqa_real_data_SW-1_112503" and "SWD&LIMS_dqa_qc_data_SW-1_112503").

13.2.1 Accuracy

The following measures of accuracy were evaluated:

- Laboratory Control Sample Evaluation;
- Surrogate Evaluation;
- Field Blanks: and
- Sample Matrix Spike Evaluation.

Results are compared to method requirements and project goals. The results of these comparisons are summarized for RFCA COCs where the result could impact project decisions. Particular attention is paid to those values near ALs when quality control (QC) results could indicate unacceptable levels of uncertainty for decision-making purposes.

Laboratory Control Sample Evaluation

The frequency of Laboratory Control Sample (LCS) measurements, relative to each laboratory batch, is given in Table 7. LCS frequency was adequate based on at least one LCS per batch. The minimum and maximum LCS results are also tabulated, by chemical, for the entire project. While not all LCS results are within tolerances, project decisions based on AL exceedances were not affected. Any qualifications of results due to LCS performance exceeding upper or lower tolerance limits are captured in the V&V flags, described in the Completeness Section.

Surrogate Evaluation

The frequency of surrogate measurements, relative to each laboratory batch, is given in Table 8. Surrogate frequency was adequate based on at least one set per sample. The minimum and maximum surrogate results are also tabulated, by chemical, for the entire project. Any qualifications of results due to surrogate results are captured in the V&V flags, described in the Completeness Section.

Field Blank Evaluation

Results of the field blank analyses are given in Table 9. Detectable amounts of contaminants within the blanks, which could indicate possible cross-contamination of samples, are evaluated if the same contaminants are detected in the associated real samples. When the real result is less than 10 times the blank result for laboratory contaminants (5 times the result for non-laboratory contaminants), the real result is disqualified. None of the chemicals detected in blanks were detected in real samples where the real sample concentration exceeded ALs, therefore, no significant laboratory blank contamination is indicated.

Table 7
Laboratory Control Sample Evaluation

						Number of	Number of
Test Method Name	CAS	Analyte		Maximum	Unit	Laboratory Samples	Laboratory Batches
SW-846 6010	11-09-7	Uranium, Total	100	106	%REC	9	9
SW-846 6010	7429-90-5	Aluminum	95	106	%REC	9	9
SW-846 6010	7439-89-6	Iron	96	105	%REC	9	9
SW-846 6010	7439-92-1	Lead	95	104	%REC	9	9
SW-846 6010	7439-93-2	Lithium	94	109	%REC	9	9
SW-846 6010	7439-96-5	Manganese	95	901	%REC	9	9
SW-846 6010	7439-97-6	Mercury	06	109	%REC	9	9
SW-846 6010	7439-98-7	Molybdenum	06	102	%REC	9	9
SW-846 6010	7440-02-0	Nickel	93	104	%REC	9	9
SW-846 6010	7440-22-4	Silver	98	100	%REC	9	9
SW-846 6010	7440-24-6	Strontium	62	105	%REC	9	9
SW-846 6010	7440-31-5	Tin	91	101	%REC	9	9
SW-846 6010	7440-36-0	Antimony	92	100	%REC	9	9
SW-846 6010	7440-38-2	Arsenic	94	101	%REC	9	9
SW-846 6010	7440-39-3	Barium	62	105	%REC	9	9
SW-846 6010	7440-41-7	Beryllium	95	801	%REC	9	9
SW-846 6010	7440-43-9	Cadmium	91	103	%REC	9	9
SW-846 6010	7440-47-3	Chromium	96	901	%REC	9	9
SW-846 6010	7440-48-4	Cobalt	93	104	%REC	9	9
SW-846 6010	7440-50-8	Copper	95	101	%REC	9	9
SW-846 6010	7440-62-2	Vanadium	94	106	%REC	9	9
SW-846 6010	7440-66-6	Zinc	16	107	%REC	9	9
SW-846 6010	7782-49-2	Selenium	92	86	%REC	9	9
SW-846 6010/6010B	7439-92-1	Lead	86	86	%REC		_
SW-846 6010/6010B	7440-41-7	Beryllium	96	96	%REC	-	-
SW-846 8260	100-41-4	Ethylbenzene	81	106	%REC	5	4
0968 978 1113	100-42-5	Styrene	80	108	%REC	2	4

Test Method Name	CAS	Analyte	Minimum	Maximum	Unit	Laboratory Samples	Laboratory Batches
		1000年間の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の	300	Section of the sectio	7.1	Sardimes	7
CW-846 8260	10061-01-5	cis-1,3-Dichloropropene	86.04	108	%KEC		+ -
0 W 0 4 6 9 2 6 0	10061-02-6	trans-1,3-Dichloropropene	68	105	%REC	2	4
SW-640 6200	106 46-7	1 4-Dichlorobenzene	87	110	%REC	5	4
SW-846 8260	102-00-1	1.3 Dichloroethane	83.67	104	%REC	5	4
SW-846 8260	7-00-701	1,2-Divilior Commission	71 94	114	%REC	5	4
SW-846 8260	108-10-1	4-Memyi-z-pemanone	77	104	%REC	5	4
SW-846 8260	108-88-3	Loiuene		104	WRFC	2	4
SW-846 8260	2-06-801	Chlorobenzene	85	104	O'DEC		4
SW-846 8260	120-82-1	1,2,4-Trichlorobenzene	/8		OLUCY OLUCY		4
SW-846 8260	124-48-1	Dibromochloromethane	16	101	WALC 2/27/2		
SW-846 8260	127-18-4	Tetrachloroethene	68	108	%KEC		+ -
0978 978 MS	1330-20-7	Xylene	80	106	%REC		4
SW-046 9260	56-23-5	Carbon Tetrachloride	87.64	112	%REC		4
SW-640 6200	67-64-1	Acetone	53.14	188	%REC	5	4
SW-640 6200	67-66-3	Chloroform	86.85	106	%REC	5	4
SW-846 8260	71 42 2	Benzene	79	107	%REC	5	4
SW-846 8260	71-43-2	1 1 1 Trickloroethane	85.14	109	%REC	5	4
SW-846 8260	/1-33-0	1,1,1-1110110100111110	84 13	102	%REC	5	4
SW-846 8260	74-83-9	Bromomethane	01:10	2001	%REC		4
SW-846 8260	74-87-3	Chloromethane	8/	100.2	O'DEC		4
SW-846 8260	75-00-3	Chloroethane	81	100.7	/ONEC		
SW-846 8260	75-01-4	Vinyl chloride	84	111.7	%KEC		+ -
SW-846 8260	75-09-2	Methylene chloride	92	108	%REC		4
SW-846 8260	75-15-0	Carbon Disulfide	80.05	119.4	%REC		4
09C8 9V8 /MS	75-25-2	Bromoform	94	102.6	%REC		4
SW-640 6200	75-27-4	Bromodichloromethane	16	103	%REC	5	4
SW-840 0200	75 34 3	1 1-Dichloroethane	83	115	%REC	5	4
SW-840 8200	75 35 1	1 1-Dichloroethene	74	121	%REC	5 5	4
SW-846 8200	78-87-5	1.2-Dichloropropane	79	104	%REC	S	4
SW-640 6200	78-03-3	2-Butanone	61.25	148	%REC	5	4
SW-840 8200	5 00 02	1 1 2-Trichloroethane	75	106	%REC	C 2	4

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					ijij	Laboratory	Laboratory
Test Method Name	CAS	Analyte		Maximum		Samples	Batches
		Tricklordethene	88.2	110	%REC	5	4
SW-846 8260		1 1 2 2 Tetrachloroethane	71	109	%REC	5	4
SW-846 8260	79-34-5	1,1,2,2-1 cuacinoi commo	86.75	117	%REC	5	4
SW-846 8260	87-68-3	Hexacilloloutations	70	108	%REC	5	4
SW-846 8260	91-20-3	Naphthalene	50	901	%REC	5	4
SW-846 8260	95-50-1	1,2-Dichlorobenzene	60	201	%BEC		
SW-846 8270	100-02-7	4-Nitrophenol	/0	70	O'DEC	1 0	
SW-846 8270	100-51-6	Benzyl Alcohol	/.9	/0	70NEC	1 (-
0ZZ 3Z XZ	105-67-9	2,4-Dimethylphenol	69	69	%KEC		-
0720 040 WS	106-44-5	4-Methylphenol	89	89	%REC		- -
W-640 6270	106-47-8	4-Chloroaniline	20	20	%REC	2	1
SW-840 82/0	100 06 0	Dhenol	69	69	%REC	2	-
SW-846 8270	7-56-801	Lieloi	99	99	%REC	2	-
SW-846 8270	111-44-4	DIS(Z-CIIIOIOCIII) I) CIIICI Ligo Ethylboxyllyhthalate	89	89	%REC	2	
SW-846 8270	1-18-/11	018(z-cutymicaytypminimica	62	62	%REC	2	_
SW-846 8270	11/-84-0	DI-II-Octylphinialar	19	61	%REC	2	
SW-846 8270	118-74-1	Hexachiorobenzene	10	64	%REC	2	
SW-846 8270	120-12-7	Anthracene	0.4	5	O'DEC		-
SW-846 8270	120-82-1	1,2,4-Trichlorobenzene	99	00	/ONEC		-
SW-846 8270	120-83-2	2,4-Dichlorophenol	89	89	%KEC		-\-
02C8 9V8 MS	121-14-2	2.4-Dinitrotoluene	71	71	%KEC		- ·
SW-040 0270	129-00-0	Pyrene	09	09	%REC		
SW-640 6270	131-11-3	Dimethylphthalate	64	64	%REC		
SW-640 62/0	137-64-0	Dibenzofuran	64	64	%REC	2	
SW-846 82/0	132-04-2	Indeno(1.2.2-d)nyrene	64	64	%REC	2	1
SW-846 8270	193-39-5	Benzo(h)fluoranthene	62	62	%REC	2 2	_
SW-846 82/0	203-99-2	Fluoranthone	70	70	%REC	2	
SW-846 82/0	202 06 0	Denzo(L)fluoranthene	57	57	%REC	2	_
SW-846 8270	218 01 0	Chrysene	61	19	%REC	C 2	-
SW-846 82/0	20638-32-0	-	89	89	%REC	C 2	-
SW-846 82/U	270-0000		62	62	%REC	C 2	

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	DYJ		Mimim	Maximum	Umit	Number of Laboratory	Number of Laboratory
Test Method Name	2					Samples	Batches
cw/ e46 8270	51-28-5	2.4-Dinitrophenol	69	69	%REC	2	
SW-846 8270 SW-846 8270	53-70-3	Dibenz(a,h)anthracene	64	64	%REC	2	-
SW-846 8270	534-52-1	4,6-Dinitro-2-methylphenol	7.1	71	%REC	2	-
SW-846 8270	56-55-3	Benzo(a)anthracene	58	58	%REC	2	-
SW-846 8270	606-20-2	2,6-Dinitrotoluene	70	70	%REC	2	_
SW-846 8270	621-64-7	n-Nitrosodipropylamine	69	69	%REC	2	-
SW-846 8270	65-85-0	Benzoic Acid	29	29	%REC	2	_
SW-846 8270	67-72-1	Hexachloroethane	99	99	%REC	2	-
SW-846 8270	77-47-4	Hexachlorocyclopentadiene	73	73	%REC		-
SW-846 8270	78-59-1	Isophorone	88	88	%REC		_
SW-846 8270	83-32-9	Acenaphthene	64	64	%REC		-
SW-846 8270	84-66-2	Diethylphthalate	69	69	%REC		
SW-846 8270	84-74-2	Di-n-butylphthalate	70	70	%REC		
SW-846 8270	85-68-7	Butylbenzylphthalate	89	89	%REC		-
SW-846 8270	86-30-6	n-Nitrosodiphenylamine	75	75	%REC		-
SW-846 8270	86-73-7	Fluorene	64	64	%REC	2	_
SW-846 8270	87-68-3	Hexachlorobutadiene	63	63	%REC	2	_
SW-846 8270	87-86-5	Pentachlorophenol	63	63	%REC	2	_
SW-846 8270	88-06-2	2,4,6-Trichlorophenol	71	71	%REC	2	-
SW-846 8270	88-74-4	2-Nitroaniline	65	65	%REC	2	-
SW-846 8270	91-20-3	Naphthalene	99	99	%REC	2	-
SW-846 8270	91-57-6	2-Methylnaphthalene	99	99	%REC	2	_
SW-846 8270	91-58-7	2-Chloronaphthalene	65	65	%REC	2	-
SW-846 8270	91-94-1	3,3'-Dichlorobenzidine	39	39	%REC	2	_
SW-846 8270	95-48-7	2-Methylphenol	29	<i>L</i> 9	%REC	2	-
SW-846 8270	95-57-8	2-Chlorophenol	71	71	%REC		
SW-846 8270	95-95-4	2,4,5-Trichlorophenol	89	89	%REC		
0770 040 040	08-05-3	Nitrobenzene	69	69	%REC	2	

Table 8
Surrogate Recovery Summary

	VOC Surrogate Recoveries	e Recoverie	S	
Number Samples	Analyte	Minimum	Minimum Maximum	Unit
10	1,2-Dichloroethane -d4	06	121.3	%REC
10	Bromofluorobenzene	68	124.2	%REC
10	Toluene - d8	92.45	130.2	%REC
	SVOC Surrogate Recoveries	ite Recoverie	SS	
# of Samples	Analyte	Minimum	Minimum Maximum	Ci ni
2	Terphenyl-d14	44	70	%REC
2	2-Fluorobiphenyl	54	99	%REC
2	o-Fluorophenol	09	72	%REC
2	Nitrobenzene-d5	62	77	%REC

Table 9
Field Blank Summary

Test Method Name	Analyte	Sample QC Code	Maximum Detected Value	Unit	Lab Results Qualifier Code
GAMMA SPECTROSCOPY	Uranium-235	FB	0.12	pCi/g	-
GAMMA SPECTROSCOPY	Uranium-235	RNS	0.183	pCi/g	-
GAMMA SPECTROSCOPY	Uranium-238	FB	2.45	pCi/g	-
GAMMA SPECTROSCOPY	Uranium-238	RNS	2.83	pCi/g	-
SW-846 6010	Aluminum	RNS	0.048	mg/L	В
SW-846 6010	Iron	RNS	0.032	mg/L	В
SW-846 6010	Manganese	RNS	0.0013	mg/L	В
SW-846 6010	Mercury	RNS	0.000057	mg/L	В
SW-846 6010	Strontium	RNS	0.00092	mg/L	В
SW-846 6010	Barium	RNS	0.0016	mg/L	В
SW-846 6010	Beryllium	RNS	0.0007	mg/L	В
SW-846 6010	Copper	RNS	0.016	mg/L	-
SW-846 6010	Zinc	RNS	0.014	mg/L	В
SW-846 8260	Toluene	FB	0.28	ug/L	JB
SW-846 8260	Toluene	RNS	3.1	ug/L	JB
SW-846 8260	Toluene	TB	3.4	ug/L	JB
SW-846 8260	Acetone	RNS	14	ug/L	JB
SW-846 8260	Acetone	TB	13	ug/L	JB
SW-846 8260	Methylene chloride	FB	0.34	ug/L	JB
SW-846 8260	Methylene chloride	RNS	0.44	ug/L	JB
SW-846 8260	Methylene chloride	TB	0.45	ug/L	JB
SW-846 8260	Naphthalene	FB	1.2	ug/L	J
SW-846 8260	Naphthalene	RNS	0.86	ug/L	J

Field Blanks (Trip, Rinse, Field) results greater than detection limits (not *U* Qualified)

Sample Matrix Spike Evaluation

The frequency of MS measurements, relative to each laboratory batch, was adequate based on at least one MS per batch. The minimum and maximum of MS results are summarized by chemical, for the entire project in Table 10. Any qualifications of results due to MS results exceeding upper or lower tolerance limits are captured in the V&V flags, described in the Completeness Section.

Table 10 Sample Matrix Spike Evaluation

Test Method	CAS	Analyte	Minimum	Maximum	Unit	Number of Laboratory Samples	Number of Laboratory Batches
SW-846 6010	11-09-7	Uranium, Total	84	384	%REC	8	8
SW-846 6010	7429-90-5	Aluminum	0	2640	%REC	8	8
SW-846 6010	7439-89-6	Iron	0	11900	%REC	8	8
SW-846 6010	7439-92-1	Lead	0	12000	%REC	8	8
SW-846 6010	7439-93-2	Lithium	93	112	%REC	8	8
SW-846 6010	7439-96-5	Manganese	0	154	%REC	8	8

Test Method	CAS	Analyte	Minimum	Maximum	Unit	Number of Laboratory Samples	Number of Laboratory Batches
SW-846 6010	7439-97-6	Mercury	92	217	%REC	7	7
SW-846 6010	7439-98-7	Molybdenum	0	103	%REC	8	8
SW-846 6010	7440-02-0	Nickel	0	105	%REC	8	8
SW-846 6010	7440-22-4	Silver	0	301	%REC	8	8
SW-846 6010	7440-24-6	Strontium	88	105	%REC	8	8
SW-846 6010	7440-31-5	Tin	86	180	%REC	8	8
SW-846 6010	7440-36-0	Antimony	27	101	%REC	8	8
SW-846 6010	7440-38-2	Arsenic	82	105	%REC	8	8
SW-846 6010	7440-39-3	Barium	78	164	%REC	8	8
SW-846 6010	7440-41-7	Beryllium	80	113	%REC	8	8
SW-846 6010	7440-43-9	Cadmium	0	104	%REC	8	8
SW-846 6010	7440-47-3	Chromium	0	107	%REC	8	8
SW-846 6010	7440-48-4	Cobalt	13	105	%REC	8	8
SW-846 6010	7440-50-8	Copper	0	173	%REC	8	8
SW-846 6010	7440-62-2	Vanadium	73	107	%REC	8	8
SW-846 6010	7440-66-6	Zinc	0	104	%REC	8	8
SW-846 6010	7782-49-2	Selenium	82	101	%REC	8	8
SW-846 6010/6010B	7439-92-1	Lead	90	101	%REC	2	2
SW-846 6010/6010B	7440-41-7	Beryllium	89	100	%REC	2	2
SW-846 8260	100-41-4	Ethylbenzene	100	145.3	%REC	2	2
SW-846 8260	100-42-5	Styrene	52.76	97	%REC	2	2
SW-846 8260	10061-01-5	cis-1,3-Dichloropropene	74.35	101	%REC	2	2
SW-846 8260	10061-02-6	trans-1,3-Dichloropropene	53.32	94	%REC	2	2
SW-846 8260	106-46-7	1,4-Dichlorobenzene	34.76	108	%REC	2	2
SW-846 8260	107-06-2	1,2-Dichloroethane	82.6	99	%REC	2	2
SW-846 8260	108-10-1	4-Methyl-2-pentanone	86	95.29	%REC	2	2
SW-846 8260	108-88-3	Toluene	72.84	92	%REC	2	2
SW-846 8260	108-90-7	Chlorobenzene	81.47	101	%REC	2	2
SW-846 8260	120-82-1	1,2,4-Trichlorobenzene	17.72	105	%REC	2	2
SW-846 8260	124-48-1	Dibromochloromethane	85.21	92	%REC	2	2
SW-846 8260	127-18-4	Tetrachloroethene	87.88	96	%REC	2	2
SW-846 8260	1330-20-7	Xylene	101	131.2	%REC	2	2
SW-846 8260	56-23-5	Carbon Tetrachloride	97.12	106	%REC	2	2
SW-846 8260	67-64-1	Acetone	90	184.4	%REC	2	2
SW-846 8260	67-66-3	Chloroform	90.27	97	%REC	2	2
SW-846 8260	71-43-2	Benzene	71.49	96	%REC	2	2
SW-846 8260	71-55-6	1,1,1-Trichloroethane	102.5	105	%REC	2	2
SW-846 8260	74-83-9	Bromomethane	94.32	113	%REC	2	2
SW-846 8260	74-87-3	Chloromethane	106	113.3	%REC	2	2
SW-846 8260	75-00 - 3	Chloroethane	103.5	118	%REC	2	2
SW-846 8260	75-01-4	Vinyl chloride	87.83	107	%REC	2	2
SW-846 8260	75-09-2	Methylene chloride	83.96	99	%REC	2	2
SW-846 8260	75-15-0	Carbon Disulfide	59.52	100	%REC	2	2
SW-846 8260	75-25-2	Bromoform	91	126.5	%REC	2	2

Test Method	CAS	Analyte	Minimum	Maximum	Unit	Number of Laboratory Samples	Number of Laboratory Batches
SW-846 8260	75-27-4	Bromodichloromethane	100	107.5	%REC	2 .	2
SW-846 8260	75-34-3	1,1-Dichloroethane	95.31	96	%REC	2	2
SW-846 8260	75-35-4	1,1-Dichloroethene	83.34	114	%REC	2	2
SW-846 8260	78-87-5	1,2-Dichloropropane	101	122.8	%REC	2	2
SW-846 8260	78-93-3	2-Butanone	81	118.4	%REC	2	2
SW-846 8260	79-00-5	1,1,2-Trichloroethane	93	106.5	%REC	2	2
SW-846 8260	79-01-6	Trichloroethene	87.23	103	%REC	2	2
SW-846 8260	79-34-5	1,1,2,2-Tetrachloroethane	109	170.5	%REC	2	2
SW-846 8260	87 - 68-3	Hexachlorobutadiene	95.38	107	%REC	2	2
SW-846 8260	91-20-3	Naphthalene	10.34	100	%REC	2	2
SW-846 8260	95-50-1	1,2-Dichlorobenzene	42.07	106	%REC	2	2
SW-846 8270	100-02-7	4-Nitrophenol	54	54	%REC	1	1
SW-846 8270	100-51-6	Benzyl Alcohol	57	57	%REC	1	1
SW-846 8270	105-67-9	2,4-Dimethylphenol	57	57	%REC	1	1
SW-846 8270	106-44-5	4-Methylphenol	59	59	%REC	1	1
SW-846 8270	106-47-8	4-Chloroaniline	45	45	%REC	1	1
SW-846 8270	108-95-2	Phenol	58	58	%REC	1	1
SW-846 8270	111-44-4	bis(2-Chloroethyl)ether	57	57	%REC	1	1
SW-846 8270	117-81-7	bis(2-Ethylhexyl)phthalate	56	56	%REC	1	1
SW-846 8270	117-84-0	Di-n-octylphthalate	52	52	%REC	l	1
SW-846 8270	118-74-1	Hexachlorobenzene	52	52	%REC	1	1
SW-846 8270	120-12-7	Anthracene	55	55	%REC	1	1
SW-846 8270	120-82-1	1,2,4-Trichlorobenzene	55	55	%REC	1	1
SW-846 8270	120-83-2	2,4-Dichlorophenol	57	57	%REC	1	1
SW-846 8270	121-14-2	2,4-Dinitrotoluene	61	61	%REC	1	1
SW-846 8270	129-00-0	Pyrene	51	51	%REC	1	1
SW-846 8270	131-11-3	Dimethylphthalate	54	54	%REC	1	1
SW-846 8270	132-64-9	Dibenzofuran	55	55	%REC	1	1
SW-846 8270	193-39-5	Indeno(1,2,3-cd)pyrene	53	53	%REC	1	1
SW-846 8270	205 - 99-2	Benzo(b)fluoranthene	49	49	%REC	1	1
SW-846 8270	206-44-0	Fluoranthene	61	61	%REC	1	1
SW-846 8270	207-08-9	Benzo(k)fluoranthene	49	49	%REC	1	1
SW-846 8270	218-01-9	Chrysene	51	51	%REC	1	1
SW-846 8270	39638-32-9	bis(2- Chloroisopropyl)ether	57	57	%REC	1	1
SW-846 8270	50-32-8	Benzo(a)pyrene	52	52	%REC	1	1
SW-846 8270	51-28-5	2,4-Dinitrophenol	57	57	%REC	1	1
SW-846 8270	53-70-3	Dibenz(a,h)anthracene	53	53	%REC	1	1
SW-846 8270	534-52-1	4,6-Dinitro-2- methylphenol	58	58	%REC	1	1
SW-846 8270	56-55-3	Benzo(a)anthracene	50	50	%REC	1	1
SW-846 8270	606-20-2	2,6-Dinitrotoluene	60	60	%REC	1	1
SW-846 8270	621-64-7	n-Nitrosodipropylamine	58	58	%REC	1	1
SW-846 8270	65-85-0	Benzoic Acid	49	49	%REC	1	1
SW-846 8270	67-72-1	Hexachloroethane	56	56	%REC	1	1
SW-846 8270	77-47-4	Hexachlorocyclopentadien e	59	59	%REC	1	1

Test Method	CAS	Analyte	Minimum	Maximum	Unit	Number of Laboratory Samples	Number of Laboratory Batches
SW-846 8270	78-59-1	Isophorone	74	74	%REC	1	1
SW-846 8270	83-32-9	Acenaphthene	56	56	%REC	1	l
SW-846 8270	84-66-2	Diethylphthalate	60	60	%REC	1	1
SW-846 8270	84-74-2	Di-n-butylphthalate	60	60	%REC	1	1
SW-846 8270	85-68-7	Butylbenzylphthalate	56	56	%REC	1	1
SW-846 8270	86-30-6	n-Nitrosodiphenylamine	63	63	%REC	1	1
SW-846 8270	86-73-7	Fluorene	56	56	%REC	1	1
SW-846 8270	87-68-3	Hexachlorobutadiene	53	53	%REC	1	1
SW-846 8270	87-86-5	Pentachlorophenol	49	49	%REC	1	1
SW-846 8270	88-06-2	2,4,6-Trichlorophenol	60	60	%REC	1	1
SW-846 8270	88-74-4	2-Nitroaniline	56	56	%REC	1	1
SW-846 8270	91-20-3	Naphthalene	55	55	%REC	1	1
SW-846 8270	91-57-6	2-Methylnaphthalene	55	55	%REC	1	ı
SW-846 8270	91-58-7	2-Chloronaphthalene	56	56	%REC	1	1
SW-846 8270	91-94-1	3,3'-Dichlorobenzidine	40	40	%REC	1	1
SW-846 8270	95-48-7	2-Methylphenol	60	60	%REC	1	1
SW-846 8270	95-57-8	2-Chlorophenol	60	60	%REC	1	1
SW-846 8270	95-95-4	2,4,5-Trichlorophenol	59	59	%REC	1	1
SW-846 8270	98-95-3	Nitrobenzene	58	58	%REC	1	1

13.2.2 Precision

Matrix Spike Duplicate Evaluation

Laboratory precision is measured through use of MSD. Adequate frequency of MSD measurements is indicated by at least one MSD in each laboratory batch. Table 11 indicates that MSD frequencies were adequate. Ideally, repeatability of matrix spike recoveries should have a relative percent difference (RPD) of 35% or less. However, RPDs exceeding 35% do not affect project decisions because all related real sample results were repeatable well below ALs.

Table 11
Sample Matrix Spike Duplicate Evaluation

Analyte	Number of Sample Pairs	Number of Laboratory Batches	Max of RPD
1,1,1-Trichloroethane	2	2	6.82
1,1,2,2- Tetrachloroethane	2	2	15.14
1,1,2-Trichloroethane	2	2	11.78
1,1-Dichloroethane	2	2	7.74
1,1-Dichloroethene	2	2	7.27
1,2,4-Trichlorobenzene	2	2	12.47
1,2,4-Trichlorobenzene	1	1	1.83
1,2-Dichlorobenzene	2	2	14.15
1,2-Dichloroethane	2	2	6.98
1,2-Dichloropropane	2	2	15.06

Analyte	Number of Sample Pairs	Number of Laboratory Batches	Max of RPD
1,4-Dichlorobenzene	2	2	11.95
2,4,5-Trichlorophenol	1	1	3.45
2,4,6-Trichlorophenol	1	1	3.39
2,4-Dichlorophenol	1	1	0.00
2,4-Dimethylphenol	1	1	0.00
2,4-Dinitrophenol	1	1	3.45
2,4-Dinitrotoluene	1	1	0.00
2,6-Dinitrotoluene	1	1	3.39
2-Butanone	2	2	4.38
2-Chloronaphthalene	1	1	3.64
2-Chlorophenol	1	1	0.00
2-Methylnaphthalene	1	1	0.00
2-Methylphenol	1	1	5.13
2-Nitroaniline	1	1	0.00
3,3'-Dichlorobenzidine 4,6-Dinitro-2-	1	1	4.88
methylphenol	1	1	3.39
4-Chloroaniline	1	1	6.45
4-Methyl-2-pentanone	2	2	2.21 .
4-Methylphenol	11	11	1.68
4-Nitrophenol	1	11	1.83
Acenaphthene	1	11	5.50
Acetone	2	2	26.42
Aluminum	6	6	111.28
Anthracene	1	1	0.00
Antimony	8	8	15.09
Arsenic	8	8	5.35
Barium	8	88	112.38
Benzene	2	2	6.10
Benzo(a)anthracene	1	1	1.98
Benzo(a)pyrene	1	1	0.00
Benzo(b)fluoranthene	1	1	0.00
Benzo(k)fluoranthene	1	1	2.02
Benzoic Acid	1	1	15.09
Benzyl Alcohol	1	1	0.00
Beryllium	8	8	27.96
Beryllium	2	2	2.27
bis(2-Chloroethyl)ether	1	1	5.41
bis(2- Chloroisopropyl)ether	1	1	0.00
bis(2- Ethylhexyl)phthalate	1	1	1.77
Bromodichloromethane	2	2	15.54
Bromoform	2	2	13.41
Bromomethane	2	2	12.18
Butylbenzylphthalate	1	1	1.77

Analyte	Number of Sample Pairs	Number of Laboratory Batches	Max of RPD
Cadmium	6	6	32.37
Carbon Disulfide	2	2	3.92
Carbon Tetrachloride	2	2	7.51
Chlorobenzene	2	2	12.38
Chloroethane	2	2	11.99
Chloroform	2	2	9.02
Chloromethane	2	2	8.08
Chromium	6	6	149.74
Chrysene	1	1	1.94
cis-1,3-Dichloropropene	2	2	13.82
Cobalt	8	8	122.39
Copper	6	6	178.86
Dibenz(a,h)anthracene	1	1	1.90
Dibenzofuran	1	1	3.70
Dibromochloromethane	2	2	13.53
Diethylphthalate	1	1	3.39
Dimethylphthalate	1	1	1.87
Di-n-butylphthalate	1	1	3.39
Di-n-octylphthalate	1	1	1.90
Ethylbenzene	2	-2	16.30
Fluoranthene	1	1	1.65
Fluorene	1	1	3.64
Hexachlorobenzene	11	1	1.94
Hexachlorobutadiene	2	2	21.81_
Hexachlorobutadiene	11	1	1.90
Hexachlorocyclopentadi		1	7.02
ene	1	1	1.80
Hexachloroethane	1	1	
Indeno(1,2,3-cd)pyrene	1 1	1	1.90 175.00
Iron	4	, 4	
Isophorone	1	6	0.00
Lead	6		97.77 3.39
Lead	2	2	
Lithium	8	8	20.09
Manganese	6	6	48.94
Mercury	7	7	12.15
Methylene chloride	2	2	7.14
Molybdenum	7	7 2	1
Naphthalene	2	1	2.65 0.00
Naphthalene	1	 	12.35
Nickel	6	6	
Nitrobenzene	1	1	0.00
n-Nitrosodiphenylamine	1	1	1.60
n-Nitrosodipropylamine	1	1	0.00
Pentachlorophenol	1	1	0.00

Analyte	Number of Sample Pairs	Number of Laboratory Batches	Max of RPD	
Phenol	1	1	0.00	
Pyrene	1	1	0.00	
Selenium	8	8	7.06	
Silver	7	7	26.32	
Strontium	8	8	23.01	
Styrene	2	2	9.74	
Tetrachloroethene	2	2	13.00	
Tin	8	8	73.76	
Toluene	2	2	12.76	
trans-1,3- Dichloropropene	2	2	12.66	
Trichloroethene	2	2	11.21	
Uranium, Total	8	8	22.22	
Vanadium	8	8	30.93	
Vinyl chloride	2	2	7.05	
Xylene	2	2	14.47	
Zinc	5	5	18.60	

Field Duplicate Evaluation

Field duplicate results reflect sampling precision, or overall repeatability of the sampling process. The frequency of field duplicate collection should exceed 1 field duplicate per 20 real samples, or 5 percent. Table 12 indicates that sampling frequencies were adequate.

Table 12
Field Duplicate Sample Frequency

Test Method Name Sample Number of % Duplicate					
Test Method Name	Sample Code	Samples	Samples		
ALPHA SPEC	REAL	4			
GAMMA SPECTROSCOPY	REAL	34	8.82%		
GAMMA SPECTROSCOPY	DUP	3			
SW-846 6010	REAL	12			
SW-846 6010/6010B	REAL	12	8.33%		
SW-846 6010/6010B	DUP	1			
SW-846 6200	REAL	3	33.33%		
SW-846 6200	DUP	1			
SW-846 8260	REAL	11	18.18%		
SW-846 8260	DUP	2			
SW-846 8270	REAL	3	33.33%		
SW-846 8270	DUP	1			

Precision of field duplicate samples is represented by the RPD value, which are given in Table 13. The majority of the RPD values were less than 10%. Lead and beryllium RPDS were 68% and 58%, respectively. However, given that there are no quality control



criteria for field duplicate samples, the magnitude of these RPDs does not impact project DQOs .

Table 13 RPD Evaluation

KPD Evaluation				
Analyte	Max of RPD %			
4-Methyl-2-pentanone	4			
Toluene	7			
Chlorobenzene	7			
Phenol	0			
bis(2-Chloroethyl)ether	0			
bis(2-Ethylhexyl)phthalate	0			
Di-n-octylphthalate	. 0			
Hexachlorobenzene	0			
Anthracene	3			
1,2,4-Trichlorobenzene	7			
2,4-Dichlorophenol	0			
bis(2-Chloroisopropyl)ether	0			
Benzo(a)pyrene	0			
2,4-Dinitrophenol	3			
4,6-Dinitro-2-methylphenol	3			
Dibenz(a,h)anthracene	0			
Copper	5			
Zinc	3			
Methylene chloride	7			
Carbon Disulfide	7			
Bromoform	7			
Bromodichloromethane	7			
Hexachlorocyclopentadiene	0			
Isophorone	0			
2,4-Dinitrotoluene	0			
Dibromochloromethane	7			
Dimethylphthalate	0			
Dibenzofuran	0			
Indeno(1,2,3-cd)pyrene	0			
Benzo(k)fluoranthene	0			
2,6-Dinitrotoluene	0			
n-Nitrosodipropylamine	0			
Benzoic Acid	3			
Chloroform	7			
Hexachloroethane	0			
Benzene	7			
4-Nitrophenol	3			
Styrene	7			
Benzyl Alcohol	0			
cis-1,3-Dichloropropene	7			
2,4-Dimethylphenol	0			
2, Dimenty iphenor				

Analyte	Max of RPD
4-Methylphenol	0
4-Chloroaniline	0 .
Trichloroethene	7
Acenaphthene	3
Diethylphthalate	0
Di-n-butylphthalate	0
Butylbenzylphthalate	0
n-Nitrosodiphenylamine	0
Fluorene	0
Hexachlorobutadiene	0
Pentachlorophenol	3
2,4,6-Trichlorophenol	0
2-Nitroaniline	3
Naphthalene	7
2-Methylnaphthalene	0
2-Chloronaphthalene	0
2-Methylphenol	0
2-Chlorophenol	0
2,4,5-Trichlorophenol	0
Nitrobenzene	0
Iron	0
Lead	68
Strontium	0
Barium	5
Beryllium	58

Completeness

Based on original project DQOs, a minimum of 25 percent of ER Program analytical results must be formally verified and validated. Of that percentage, no more than 10 percent of the results may be rejected, which ensures that analytical laboratory practices are consistent with quality requirements. Table 14 shows the number and percentage of validated records (codes without "1"), verified records (codes with "1"), and rejected records for each analyte group. The percentage of rejected records was acceptable. Because the frequency of validation for the ER Program is adequate, the results are considered adequate for use in project decisions.

13.2.3 Sensitivity

Reporting limits, in units of ug/kg for organics, mg/kg for metals, and pCi/g for radionuclides, were compared with the RFCA WRW and Ecological Receptor ALs. Adequate sensitivities of analytical methods were attained for all COCs that affect project decisions. "Adequate" sensitivity is defined as a reporting limit less than an analyte's associated AL, typically less than one-half the AL.

13.3 Summary of Data Quality

Data quality is acceptable for project decisions based on the V&V criteria cited and with the qualifications given. If additional V&V information is received, IHSS Group SW-1 records will be updated in the Soil Water Database. Data qualified as a result of additional data will be assessed as part of the Comprehensive Risk Assessment process.

Table 14
Validation and Verification Summary

	vanuation and vermeation Summary				
Validation Code	Number Records	Radionuclides	Metals	VOCs	SVOCs
No V&V	87	87	0	0	0
1	9	9	0	0	0
J	42	0	41	1	0
J1	5	0	5	0	0
V	887	113	257	364	153
V1	27	9	18	0	0
JB	12	0	0	12	0
UJ	39	0	17	19	3
Total	1108	218	338	396	156
Validated	980	113	315	396	156
% Validated	88.45%	51.83%	93.20%	100.00%	100.00%
Verified	41	18	23	0	0
% Verified	3.70%	8.26%	6.80%	0.00%	0.00%

Key:

Validated

J, V, JB,UJ

Verified

1, J1, V1

14.0 CONCLUSION

Results of the accelerated action justify No Further Accelerated Action. Justification is based on the following:

- 1. No accelerated action required by surface soil data;
- 2. No accelerated action required by the subsurface soil risk screen;
- 3. No accelerated action required by the stewardship evaluation; and
- 4. No accelerated action required by ALARA consideration (i.e., no elevated concentrations of radionuclides).

15.0 ADMINISTRATIVE RECORD DOCUMENT

Administrative Record documents in addition to those listed in the ER RSOP Notification are as follows:

CDPHE, EPA, 2002, Approval of NFA Designation for IHSSs and PACs, February 14.

DOE, 2002a, Buffer Zone Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, June.

DOE, 2003c, RFCA Standard Operating Protocol for Recycling Concrete, Rocky Flats Environmental Technology Site, Golden, Colorado.

DOE, 2003, Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation Modification 1, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

16.0 REFERENCES

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DOE, 2002b, Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation Modification 1, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

DOE, 2003c, Environmental Restoration RFCA Standard Operating Protocol Notification #03-09, Rocky Flats Environmental Technology Site, Golden, Colorado, July.

DOE, 2003d, RFCA Standard Operating Protocol for Recycling Concrete, Rocky Flats Environmental Technology Site, Golden, Colorado.

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EPA QA/G-4, 1994a, Guidance for the Data Quality Objective Process.

EPA 540/R-94/012, 1994b, USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review.



EPA 540/R-94/013, 1994c, USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review.

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EPA, 2003a, No Further Accelerated Action (NFAA) Justification for Ash Pits, and Trenches T-3, T-4 and T-7 Approval Letter, June 12.

EPA, 2003b, ER Notification #03-09 Approval Letter, September 4.

Kaiser-Hill (K-H), 2002a, General Guidelines for Data Verification and Validation, DA-GR01-v1, December.

K-H, 2002b, V&V Guidelines for Isotopic Determinations by Alpha Spectrometry, DARC01-v1, February.

K-H, 2002c, V&V Guidelines for Volatile Organics, DA-SS01-v1, December.

K-H, 2002d, V&V Guidelines for Semivolatile Organics, DA-SS02-v1, December.

K-H, 2002e, V&V Guidelines for Metals, DA-SS05-v1, December.

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Appendix A Project Photographs

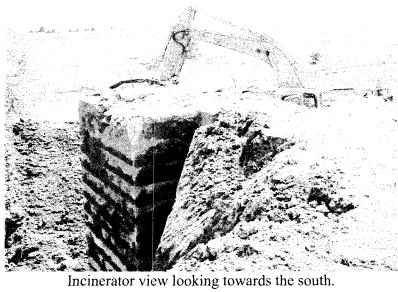






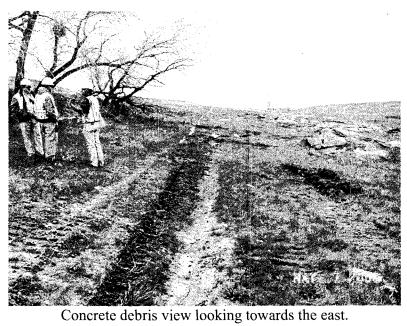
Incinerator chutes.





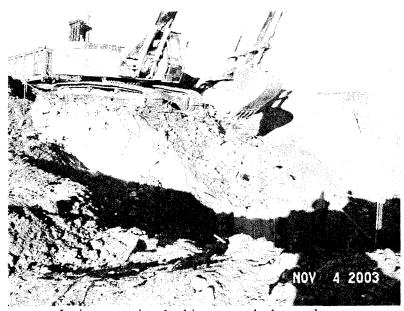


Excavation activities at the Incinerator.

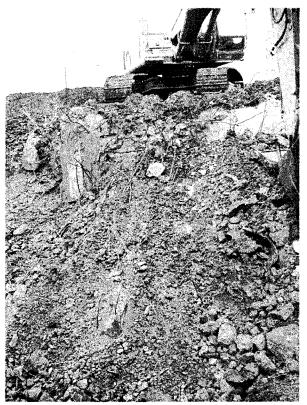




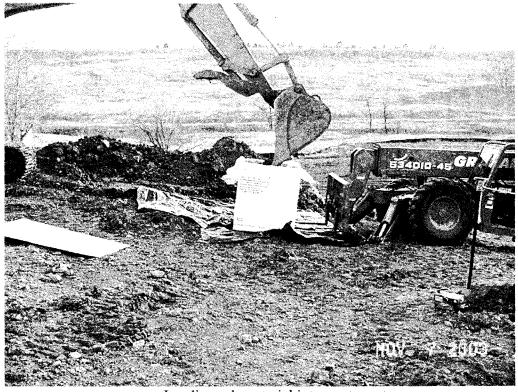
Lower slab debris.



Incinerator view looking towards the northeast.

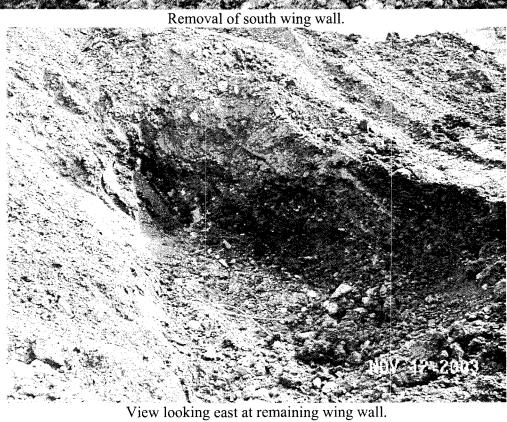


Incinerator slab.



Loading ash material into waste crate.





Preliminary Review Draft for Interagency Discussion/Not Issued for Public Comment



North wall prior to removal.



Preliminary Review Draft for Interagency Discussion/Not Issued for Public Comment



Trash debris.



Loading concrete into intermodal.

Preliminary Review Draft for Interagency Discussion/Not Issued for Public Comment



Soil removal from bank.



Bottles and trash debris.

Appendix B Correspondence



NEAH

1. U1/UZ ASH 4001 ASH



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 16TM STREET - BUITE 300
DENVER, CO 60202-2486
Phone 800-227-8617
http://www.epa.gov/region08

Ref:8EPR-F

June 12, 2003

Richard J. DiSalvo
Acting Assistant Manager for Environmental Stewardship
U.S. Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

Subject:

No Further Accelerated Action (NFAA) Justification for Ash Pits PAC Reference Number(s) SW-133.1, SW-133.2, SW-133.4 and 1702 (dated June 11, 2003), NFAA Justification for Trench T-7 PAC Reference Number: NE 111.4 (dated May 21, 2003, NFAA Justification Trenches T-3 and T-4 PAC Reference Number: 111.1 (dated May 21, 2003)

Dear Mr. DiSalvo:

The Environmental Protection Agency has reviewed the documents referenced above and agree that the residual contamination at the Ash Pits, and Trenches T-3, T-4 and T-7 does not pose a significant threat to human health given that Rocky Flats will become a wildlife refuge at the completion of the cleanup, and that a wildlife refuge worker would be the individual with the highest potential for exposure to contaminants. EPA therefore agrees that no further accelerated action is necessary at the Ash Pits, and Trenches T-3, T-4 and T-7 to protect human health.

However, considerable work still needs to be conducted to determine whether residual contamination at Rocky Flats poses a significant ecological sisk. Until that work is complete, EPA cannot assert that NFAA determinations for the Ash Pits, and Trenches T-3, T-4 and T-7 are protective of both human health and the environment. EPA looks forward to working with DOE and its contractor on the ecological portion of the Comprehensive Risk Assessment that is currently underway.

Furthermore, since the Ashpits, and Trenches T-3. T-4 and T-7 contain contamination at levels that would not allow for unrestricted use, a comprehensive, enforceable plan for long-term stewardship of these areas is critical to assure that the remedy for Rocky Flats continues to be protective. BPA, again, looks forward to working with the DOE and the State of Colorado in developing such a plan and putting the necessary agreements into place.

Revised 01/02

CORRES. CONTROL INCOMING LTR NO.

00120RF02

DUE DATE

DIST

BOGENBERGER





2002 FEB 26 A 9 31

CORRESPONDENCE CONTROL



February	14.	200	2

Joe Legare
Assistant Administrator for Environment and Infrastructure
U.S. Department of Energy-RFFO
10808 Highway 93, Unit A
Golden CO 80401-8200

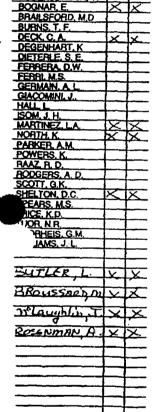
RE: Approval of NFA designation for IHSSs and PACs

Dear Mr. Legare:

Since 1994 the Site has been proposing IHSSs and PACs for No Further Action (NFA) or No Further Remedial Action (NFRA) in the annual and quarterly Updates to the Historic Release Reports (HRR). No formal process was in place for the agencies to disposition the proposed NFA/NFRA sites. This fall an NFA Working Group developed and implemented a systematic approach for reviewing NFA/NFRA proposals in accordance with RFCA Attachment 6 and the Implementation Guidance Document. Using this systematic approach, 79 proposed sites were discussed during November and December 2001. It was agreed that 63 of the 79 sites meet the criteria for NFA/NFRA sites. This letter provides formal approval of these 63 sites listed in the attached table (Table 1). The remaining sixteen sites either require additional information, additional characterization, or limited remediation prior to approval as NFA/NFRA sites. Approved meeting minutes are located in the Site Project File and provide a record of discussions and agreements reached among the NFA Working Group members.

NFA meeting discussions also resulted in several corrections or clarifications to previous HRR Updates and associated correspondence. Some of the items are significant enough that they will be addressed in the 2002 Annual HRR Update. Other items only require documentation here in order to complete the process. Table 2 describes these clarifications and corrections.

If you have any questions please contact Gary Kleeman (EPA), 303-312-6246, Carl Spreng (CDPHE), 303-692-3358 or Reginald Tyler (DOE), 303-966-5927.

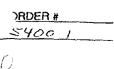


ADMN. RECORD

Ref. Ltr. #

Reviewed for Addressee

Corres, Control RFP



Sincerely,

Steven H. Gunderson

RFCA Project Coordinator

Colorado Department of Public

Health and Environment

Tim Rehder

Rocky Flats Project Manager

Environmental Protection Agency

Thy R Rehole,

Enclosure

cc w/Enc:

L. Butler, KH

M. Broussard, KH

R. Tyler, ERWM, RFFO

G. Kleeman, EPA

C. Spreng, CDPHE

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	APPROVED		12/5/01	12/5/01		12/19/01	12/19/01	12/19/01	12/19/01		11/14/01	11/14/01
	UPDATED		Annual 2001	Annual 1997³ Annual 2001		Quarterly 79 Quarterly 8 ¹⁵ Annual 2001	. Annval 1996² Annval 2001	Annual 1996 ² Annual 2001	Quarterly 8 ¹⁵ Annual 2001		Quarterly 79 Annual 2000 ²⁶	Armual 1997 ³ Armual 2000 ²⁶
7 240	IDENTIFIED	2001 Anneal HRR Update	HRR¹	Quarterly 9 ¹³		Quarterly 6 ¹⁶	HRR¹	HRR ³	Quarterly 6 ¹⁶	2000 Annual HRR Update	Quarterly 5 ¹⁰	HRR¹
Υ.	DESCRIPTION	2001 Anneal	Ash Pit 3	Recently Identified Ash Pit (also referred to as TDEM-1)	And the fact of the state of th	Tank T-2 Spill in Building 460	Building 865 Drum Storage	Building 883 Drum Storage	Gasoline Spill Outside of Building 980		Modular Tanks and 910 Treatment System Spill (formerly 000-503)	Building 371 Parking Lot (2 locations designated on Plate #2)
	PAC		SW-133.3	SW-1701		400-812	800-179	800-180	900-1308		NE-1409	300-156.1
	OO		5	S	10	ΙΑ	15	15	Y]		BZ	ΥI
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Table 1	IDENTIFIED	TALLEY OF THE STATE OF THE STAT	Actual Description	HRR¹	HRR¹	Quarterly 79	Annual 1997³	HILL	
Ta	DESCRIPTION	Dadiesers Natificate Bills 112	Walte of Confidential Pacific	Valve Vault 7	Trench T-1	Septic Tank East of Building 991	Release of F001 Listed Waste Water to Soil (identified as 900-1307 in Annual 1997; reassigned 900-1318 in Annual	Con Description of Management	
	PAC		Tr Great (Trus	700-123.1	900-108	900-1311	900-1318		10 Table 10
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IHSS	on	PAC	DESCRIPTION	IDENTIFIED	UPDATED	APPROVED	NOTES
			1996 Annus	1996 Annual BRR Update			
166.1	9	NE-166.1	Trench A	HRR¹	Annual 1996²	11/14/01	
166.2	9	NE-166.2	Trench B	HRR¹	Amual 1996 ²	11/14/01	
166.3	9	NE-166.3	Trench C	HRR¹	Annual 1996 ²	11/14/01	
167.2	7	NE-167.2	Pond Area Spray Field (Center Area)	HRR¹	Annual 1996 ²	11/14/01	
167.3	0	NE-167.3	South Area Spray Field	HRR¹	Annual 1996 ²	11/14/01	
216.1	9	NE-216.1	East Spray Fields - North Area	HRR¹	Armual 1996 ²	11/14/01	
204	15	400-204	Original Uranium Chip Roaster	HRR¹	Annual 1996 ²	11/14/01	
158	ΑI	500-909	Release of Spent Photographic Fixer Solution	Anmai 1996²	•	11/14/01	
			Quarterly HRR Update 7	RR Update 7			
114	7	NW-1502	Improper Disposal of Diesel- Contaminated Material at Landfill (formerly NW-177)	Quarterly 25	Quarterly 36 Quarterly 79	12/19/01	

T	IDENTIFIED UPDATED APPROVED NOTES	Quarterly 1 ²⁴ Quarterly 7° 12/19/01	ed by EPA in 1992; awaiting CDPHE concuerence.	HRR¹ . 12/19/01	HRR¹ - 11/14/01	HRR¹ - 11/14/01	HRR ¹ - 11/14/01	HRR ¹ - 11/14/01	HRR ¹ - 12/19/01	- 12/19/01	HRR ¹ - 11/14/01	HRR ¹ - 11/14/01
I ann I	DESCRIPTION	Improper Disposal of Fuel Contaminated Material at Landfill	Sites approved by EPA in 1992, aw	Tear Gas Powder Release	NE Buffer Zone Gas Line Break	East Inner Gate PCB Spill	Gasoline Spill - Building 920 Guard Post	Fuel Spill into Woman Creek Drainage	Roadway Spraying	Mercury Spill - Valve Vault 124-B, Building 124	Building 123 Phosphoric Acid Spill	T130 Complex Sewer Line Leaks
	PAC	NW-1503 E		NE-1400	NE-1401 P	NE-1402 B	NE-1403 P	SW-1700 F	000-501 R	100-600 B	100-601 B	100-604 T
	no	7		BZ	BZ	BZ	BZ	BZ	BZ	ΙΨ	4I	IA
	IHSS	114		NA	NA	NA	NA	NA	NA	NA .	NA	NA

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IDENTIFIED	HRR¹	HRR ¹	HRR¹	HRR¹	HRR ¹	HRR'	HRR¹	HRR¹	HRR ¹	HRR¹
DESCRIPTION	Building 115 Hydraulic Oil Spill	Building 125 TCE Spill	Asbestos Release - Building 123	Battery Solution Spill - Building 119	Scrap Roofing Disposal	Sulfuric Acid Spill – Building 371	Building 331 North Area	Roof Fire, Building 381	Potassium Hydroxide Spill North of Building 374	Evaporator Tanks North of Building 374
PAC	100-605	100-606	100-610	100-612	300-700	300-701	300-703	300-704	300-705	300-706
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I more I	IDENTIFIED	HRR¹	HRR¹	HRR¹	HRR¹	HRR¹	HRR¹	HRR¹	HRR¹	HRR¹	HRR¹
37	DESCRIPTION	Sanitizer Spill	Gasoline Spill North of Building 331	Building 443 Tank #9 Leak	Catalyst Spill, Building 440	Vacuum Pump Leak - Building 442	Oil Leak - 446 Guard Post	RCRA Storage Unit #1	Compressor Waste Oil Spill - Building 776	Uranium Incident - Building 778	Sulfuric Acid Spill, Building 883
	PAC	300-707	300-710	400-805	400-806	400-808	400-809	500-903	700-1107	700-1109	800-1202
	on	ΑI	IA	IA.	IA	ΙΑ	IA	IA	IA	IA	IA
	IHSS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

PAC		DESCRIPTION	IDENTIFIED	UPDATED	APPROVED	NOTES
800-1203		Sanitary Sewer Line Break Between Buildings 865 and 886	HRR¹	•	11/14/01	
800-1206		Fire, Building 883	HRR¹	. •	11/14/01	
800-1211		Capacitor Leak, Building 883	HRR¹		11/14/01	
900-1302	•	Gasoline Spill	HRR¹	•	11/14/01	
900-1303		Natural Gas Leak	HRR¹	•	11/14/01	
900-1304		Chromic Acid Spill - Building 991	HRR¹		11/14/01	
900-1305		Building 991 Roof	HRR¹	•	11/14/01	

TABLE 2: Clarifications to documentation associated with recently approved NFA/NFRA sites

YEAR	PAC	TITLE	CORRECTION / CLARIFICATION
2000	600-164.1	B771 Radioactive Slab	Appendix 1, pg 124: The correct title should read Radioactive Slab from Building 771.
2000	600-1001(a)	Waste Oil in PAC 1001	Page 47: As stated; PAC 600-1001 will be investigated. It is only the waste oil spill identified as 600-1001(a) which was cleaned up upon discovery that is agreed to as NFA.
2000	100-607	B111 Transformer PCB Leak	As way of clarification to a statement in the October 2, 2001 CDPHE letter stating that the Site had not proposed this PAC as a potential NFA; This PAC was not proposed in the 2001 Annual Update to the HRR because PAC 600-607 was approved NFA via separate letter dated April 12, 2001, and required no further evaluation.
2001	100-603	B123 Bioassay Waste Spill	Clarification is required due to confusion over the write-up provided under Description of Operation or Occurrence and Physical/Chemical Description Constituent Released in the 2001 HRR. The release was contained with-in the trench and 8 feet of the building with berms as confirmed by sampling. Based on this, rainwater being pumped from the trench at the time of the release at locations greater than 8 feet from the building and both south and southeast of the building was not contaminated by the release. The contaminated rainwater contained with-in the bermed area of the trench totaled approximately 100 gallons and was neutralized, pumped and treated at 374.

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time:

May 1, 2003/9 am

Site Contact(s):

Norma Castaneda, Reg Tyler, DOE RFFO

Chad Blake, Nick Demos, Gerry Kelly, Annette Primrose, KH Team

Phone:

303 966-4226, 303 966-5927

Regulatory Contact:

Gary Kleeman, EPA

Harlen Ainsough, Elizabeth Pottorff, CDPHE

Phone:

303 312-6246, 303 692-3327, 303 692-3429

Agency:

EPA and CDPHE

Purpose of Contact: Develop Characterization Plan for the Incinerator

Discussion

A meeting was held at 9am on Thursday, May 1, 2003 to discuss the path forward for the newly discovered Incinerator. Based on these discussions, and a site visit of the groundwater seeps, following are the agreed upon characterization approach and hold points. Also included are additional data requested at the meeting. Groundwater data from nearby wells will be provided by May 12th along with existing data from the nearby borehole.

Background information

IHSS 133.6 – Concrete Wash Area was an area used during plant construction to washout concrete trucks prior to leaving Site. Excess, clean concrete up to 5 feet thick is present in some locations and is being removed as a Best Management Practice. Because the concrete is not contaminated, this activity is not a remedial action. As described in the Contact Record dated March 17, 2003, samples were collected under the excess concrete on March 17, 2003 to close out the IHSS.

The former incinerator, IHSS 133.5, was known to be in this area based on old aerial photos. The exact location could not be determined because the concrete washout in this area is up to 8 feet thick. It was suspected that the Incinerator slab, or portions of the Incinerator structure, might still be present, so excavation began in the area where the slab was expected first. Sampling was planned for this area even if the slab was not found, to determine if a release to the environment had occurred due to incinerator operations. The slab was not found at the expected location and samples were collected on April 16, 2003 as described in the Contact Record dated March 17, 2003.

On April 24th, while concrete removal was underway at this IHSS, the southern face of the Incinerator was uncovered sufficiently enough to be identified. The incinerator is built into the hillside and it appears that, based on old photos, the structure was partially backfilled along the north, east and west sides at that time. The 1952 engineering drawings indicate that the slab thickness is 1'3". No utilities are shown on the drawings, and recent interviews with several workers indicate that the materials within the Incinerator were lit using a propane torch or matches.



Contact Record 6/20/02 Rev. 6/20/02 Because it was found on the last working day of the week and rain was forecast for the weekend, the excavation was partially backfilled to keep precipitation away from the Incinerator and to allow the excavation to drain. About the upper 10 feet of Incinerator was left exposed. The roof had been buried by about a foot of soil, and about half the roof area was exposed. Radiological surveys of part of the outside surfaces of the Incinerator and the equipment were performed and were negative.

Additional radiological surveys of the exposed Incinerator sides and roof were performed on Monday, April 26th. A slightly elevated area was found on the roof near the former location of the Incinerator Stack. Activities at this area were detectable but well below action limits (i.e. this material is free releasable).

Unrelated to the Incinerator, lab debris with elevated beta radiation was discovered about 300 feet south of the Incinerator on May 1, 2003. The Historical Release Report for the area describes that noncombustible glassware and trash was collected in a nearby dumpster, so this type of material was not unexpected. The immediate area where the trash was found is posted as a radioactive material area and the material will be removed and disposed as waste.

Characterization Approach

The following sampling approach was developed to ensure that there were sufficient controls on the sampling process to proceed without requiring a SAP Addendum. In addition to the sampling effort, groundwater data from nearby wells will be provided for use in the decision making process.

- Sample roofing material for asbestos. The exposed roof is covered with roofing materials.
 The sampling was completed on April 24th and this material was found to be 20% asbestos containing material (ACM).
- 2) Obtain soil samples of the fill material on top of and surrounding the incinerator. The origin of the fill dirt is unknown and the samples will be analyzed for radionuclides, metals and volatile organic compounds (VOCs) in the onsite lab. Samples were collected on April 29th. Results are expected by May 2nd. Preliminary gamma spec results do not show elevated radioactivity. Semi volatile organic compound (SVOC) samples were also collected and will be analyzed offsite with results expected in 2 weeks.
- 3) Hold Point No additional sampling activities will proceed until the radionuclide, metals and VOC soil sample results are received. If soil results are below action levels, then excavation of the Incinerator will proceed to allow additional sampling. SVOC results will not delay the following activities. The excavated soil will remain in the immediate area. If soil samples are above action levels, then a decision on how to proceed will be made in consultation with the regulators. If only the soil on top of the incinerator is above action levels, then excavation of the sides may proceed without disturbing these soils. The excavation process follows, although it may be modified in response to field conditions.
- 4) To avoid hazards from falling soil and other materials, the soil will be removed from the top of incinerator first using manual methods, exposing roofing materials and any potential hazards associated with the former stack and hopper locations. Qualified asbestos workers will remove roofing materials and this waste will be disposed offsite as ACM. If hazards exist, mitigate as necessary. Verify the type of fill material, if any is present, at the former stack and hopper locations.
- 5) Excavate the south side of incinerator, including the southernmost portions of the east and west walls that were exposed when the Incinerator was operating. Be alert for the presence of ash in the fill material and be prepared to segregate and sample as necessary.
- 6) As evident from the original construction photos, a fire door or similar opening is present about half way down the Incinerator. When the fire door is exposed on the west side, stop excavating, leaving a safe access for a sampler to the door. Open or remove door as

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required. Take photographs as possible. No entry into the Incinerator will be allowed. Samples will be collected as follows:

- a) Beryllium and rad swipes will be collected from inside the Incinerator by a sampler wearing a full-face respirator and using a pole or other extension device.
- b) Collect soil/ash samples if present using an extension device. Analyze at the onsite lab to get quick-turnaround total metals and radionuclides results. Additional samples will be collected if needed to satisfy waste acceptance criteria.
- Collect firebrick or asbestos containing materials as possible for offsite asbestos analysis and onsite metals and radionuclide analysis.
- d) When sampling is complete, the door will be closed or the opening otherwise sealed if the opening will be left exposed for extended periods.
- 7) Excavate to near the original ground surface, exposing the two openings on the south side of the Incinerator in a manner that safely allows sampler access to these openings. Obtain radiological and beryllium swipes, photographs and soil/ash samples as described in item 6 above. When sampling is complete, the door will be closed or the opening otherwise sealed.
- 8) Excavate along the southernmost portions of the east and west walls that were exposed when the Incinerator was operating. Be alert for the presence of ash material in the fill dirt and be prepared to segregate as necessary. For samples proposed east and west of the Incinerator, locate the most likely sample locations, potentially using the lower wing walls shown on the 1952 Engineering Drawings for guidance. As possible, excavate along the slope shown in earlier photos. Two samples are planned for the east side of the Incinerator and one on the west side as per the attached sketch map. However, actual sample locations may vary depending on field conditions and the presence of ash or staining.
- 9) Continue excavating to expose the original road surface south of the Incinerator. Ground surface elevations are available from the 1952 Engineering Drawings and will be used to guide the excavation. As above, two samples are planned to be collected from the area in front of the Incinerator including soils from directly beneath the ash trays/chutes. However, sample locations will be biased to the areas with the most evidence or likelihood of potential contamination from ash or other spills. The attached sketch map shows the proposed locations although the actual field locations will be biased to areas with visible staining or other indications of ash storage.
 - a) Analyze the soil samples for radionuclides, metals, VOCs, and dioxins/furans.
 - i) Samples will be analyzed onsite for radionuclides and VOCs.
 - Metal samples will be sent offsite for full suite totals analyses including beryllium.
 - iii) Dioxin/furan samples will be analyzed offsite using method 8290. This analysis method is currently available to the project and will more quickly provide information on the presence or absence of the dioxins and furans but will not provide additional information on the presence or absence of the congeners. Results will indicate the presence of these compounds, indicate whether a remedial action is required, and indicate whether additional analyses are required.
 - b) Additional samples may be required depending on the results and will be determined using the consultative process.
- 10) As soon as possible, collect seep samples from two downgradient seeps identified in the walkdown on May 1, 2003. One seep location has a slotted pipe that can be used for sampling, the other does not. Water samples will be analyzed for radionuclides by gamma spectroscopy, and total metals.
- 11) Perform radiological surveys of the exterior surfaces of the Incinerator sufficiently for waste characterization.



Contact Record 6/20/02 Rev. 6/20/02

- 12) Hold Point- No further activities will occur until results are received and discussed with the regulatory agencies. Based on the data, the decision will be made on how to disposition the Incinerator.
 - a) At this time, it is anticipated that all portions of the incinerator will be removed that were once in contact with ash. The footings and wing walls may be left in place if uncontaminated.
 - Depending on the sampling results, additional groundwater wells or surface water sampling may be required.
 - c) A data summary or similar report will be developed with the results of the path forward approach along with an explanation of why this approach was taken.

Contact Record Prepared By: Annette Primrose

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S. Bell, RFFO

R. Tyler, RFFO

L. Brooks, K-H ESS
L. Butler, K-H RISS
C. Deck, K-H Legal
R. DiSalvo, RFFO
S. Gunderson, CDPHE
J. Legare, RFFO
N. Castaneds, RFFO

D. Mayo, K-H RISS J. Mead, K-H ESS S. Nesta, K-H RISS K. North, K-H ESS T. Rehder, USEPA D. Shelton, K-H C. Spreng, CDPHE Additional Distribution
(choose names as applicable):
M. Broussard, K-H RISS
J. Hindman, CDPHE
G. Kleeman, USEPA
D. Kruchek, CDPHE
L. Norland, K-H RISS
A. Primrose, K-H RISS
E. Pottorff, CDPHE
H. Ainscough, CDPHE
N. Demos, K-H RISS
M. Bemski, K-H RISS

D. Strand, K-H RISS

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time:

May 13, 2003/12:15 pm

Site Contact(s):

Norma Castaneda, DOE RFFO

Nick Demos, Annette Primrose, KH Team

Phone:

303 966-4605, 303 966-4385

Regulatory Contact:

Gary Kleeman, EPA

Phone:

Harlen Ainsough, Elizabeth Pottorff, CDPHE

303 312-6246, 303 692-3327, 303 692-3429

Agency:

EPA and **CDPHE**

Purpose of Contact: Initial Sampling Requirements Identified within the Characterization Plan for the Incinerator as Stated in RCR May 1, 2003

A Regulatory Contact Record (RCR) was sent out on May 1, 2003 discussing the path forward for the Incinerator Site (IHSS 133.5). This RCR is being sent to document fulfillment of initial sampling requirements thereby allowing work to resume (i.e., excavation of the surrounding soils and further characterization efforts).

This RCR documents the discussions held on May 12 and 13th, 2003, that all initial sampling has been completed in accordance with the May 1, 2003 RCR. Three soil sample locations were identified to characterize the fill material on top of and surrounding the incinerator. Two samples from the material placed on top of the Incinerator and one sample from a lower area adjacent to the south-west side of the structure. The samples were analyzed for radionuclides (gamma spectroscopy), total metals (both XRF and 8260), VOCs and Semi VOCs. All of the data has been compared to and is below the Wildlife Refuge Worker Action Levels.

The project is preparing to resume work in accordance with the May 1, 2003, RCR.

Required Distribution:

S. Bell, RFFO L. Brooks, K-H ESS L. Butler, K-H RISS C. Deck, K-H Legal R. DiSalvo, RFFO S. Gunderson, CDPHE J. Legare, RFFO N. Castaneds, RFFO

Additional Distribution

D. Mayo, K-H RISS M. Broussard, K-H RISS J. Mead, K-H ESS J. Hindman, CDPHE G. Kleeman, USEPA S. Nesta, K-H RISS D. Kruchek, CDPHE K. North, K-H ESS L. Norland, K-H RISS T. Rehder, USEPA D. Shelton, K-H A. Primrose, K-H RISS E. Pottorff, CDPHE C. Spreng, CDPHE H. Ainscough, CDPHE N. Demos, K-H RISS M. Bemski, K-H RISS D. Strand, K-H RISS C. Blake, K-H RISS



R. Tyler, RFFO

Reeder, Daniel

From:

Primrose, Annette

Sent:

Monday, June 30, 2003 6:46 AM

, o:

Brooks, Laura

Cc:

Broussard, Marcella

Subject:

Paragraph on Incinerator

More than a paragraph. Hope it meets your needs.

During removal of excess, clean concrete from an area used during plant construction to washout concrete trucks prior to leaving Site, the former Incinerator, IHSS 133.5, was found on April 24, 2003. It was suspected that the Incinerator slab, or portions of the Incinerator structure, might still be present in this area, however, the exact location could not be determined because the concrete washout in this area is up to 8 feet thick.

The incinerator is built into the hillside and it appears that, the structure was partially backfilled along the north, east and west sides while it was operating. After it was abandoned, the rest of the structure was covered with fill, then clean excess concrete was poured over it and much of the surrounding area as part of the washout operations.

Radiological surveys of the exposed Incinerator sides and roof were performed and activities were detectable but well below action limits (i.e. this material is free releasable). Beryllium swipes were below action levels except those taken immediately within the lower ash chutes. Soil samples collected adjacent to the Incinerator were also below action levels. Soil/ash samples and radiological surveys from within the lower ash chutes indicate depleted uranium is present above action levels. An approach is being developed to safely remove the Incinerator either late this fiscal year or early in FY04.

Annette Primrose .4385 cell (303) 994-2761



ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time:

10-22-03/12:15

Site Contact(s):

Annette Primrose

Phone:

303 966-4385

Regulatory Contact:

Gary Kleeman

Phone:

303 312-6246

Agency:

EPA

Purpose of Contact: Incinerator confirmation samples

Discussion

As was previously agreed upon, two additional confirmation samples will be collected from beneath the Incinerator slab when it is removed. The confirmation sample analytical suite is:

- Radionuclides
- Metals (including Be and Li)
- Dioxins/Furans
- **VOCs**

If radionuclide and metal results are below action levels, then backfill will be permitted. The radionuclides will be analyzed using gamma spectroscopy.

Contact Record Prepared By: Annette Primrose

Required Distribution

- S. Bell, RFFO
- J. Berardini, K-H
- L. Brooks, K-H ESS
- M.Broussard, K-H RISS
- L. Butler, K-H RISS
- G. Carnival, K-H RISS
- N. Castaneda, RFFO
- C. Deck, K-H Legal R. DiSalvo, RFFO
- S. Gunderson, CDPHE

- M. Keating, K-H RISS
- G. Kleeman, USEPA
- D. Kruchek, CDPHE
- D. Mayo, K-H RISS
- R. McCalister, DOE
- J. Mead, K-H ESS
- S. Nesta, K-H RISS
- L. Norland, K-H RISS
- K. North, K-H ESS
- E. Pottorff, CDPHE

- A. Primrose, K-H RISS
- T. Rehder, USEPA
- S. Serreze, RISS
- D. Shelton, K-H
- C. Spreng, CDPHE
- S. Surovchak, RFFO
- K. Wiemelt, K-H RISS
- C. Zahm, K-H

Additional Distribution (choose names as applicable):



Contact Record 8/27/03 Rev. 8/27/03

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time:

November 12, 2003/4:35 pm

Site Contact(s):

Annette Primrose

Norma Castaneda 303 966-4226

Phone: 303 966-4385

Regulatory Contact: Phone:

Gary Kleeman

303 312-6246

Agency:

EPA

Purpose of Contact: Permission to backfill at the Incinerator (SW-1)

Discussion

As described in the October 22nd contact record, the decision to backfill at the Incinerator will be made based on the results of the confirmation sample gamma spectroscopy and metals results. These results were received and all are below the Wildlife Refuge Worker action levels. Based on this, backfill is permitted.

In addition, it was discussed that three concrete structures will remain; the footer under the northern wall, and the two caissons that were located under the incinerator where the southern wing walls joined this structure. None of these remaining structures were in contact with ash and all will be greater than 3 feet below grade after final regrading.

As later discussed on November 13, 2003, a small amount of native fill was removed from the very top of the incinerator. Sample results for this material were below the Wildlife Refuge Worker action levels and it was agreed that this material could also be used as backfill.

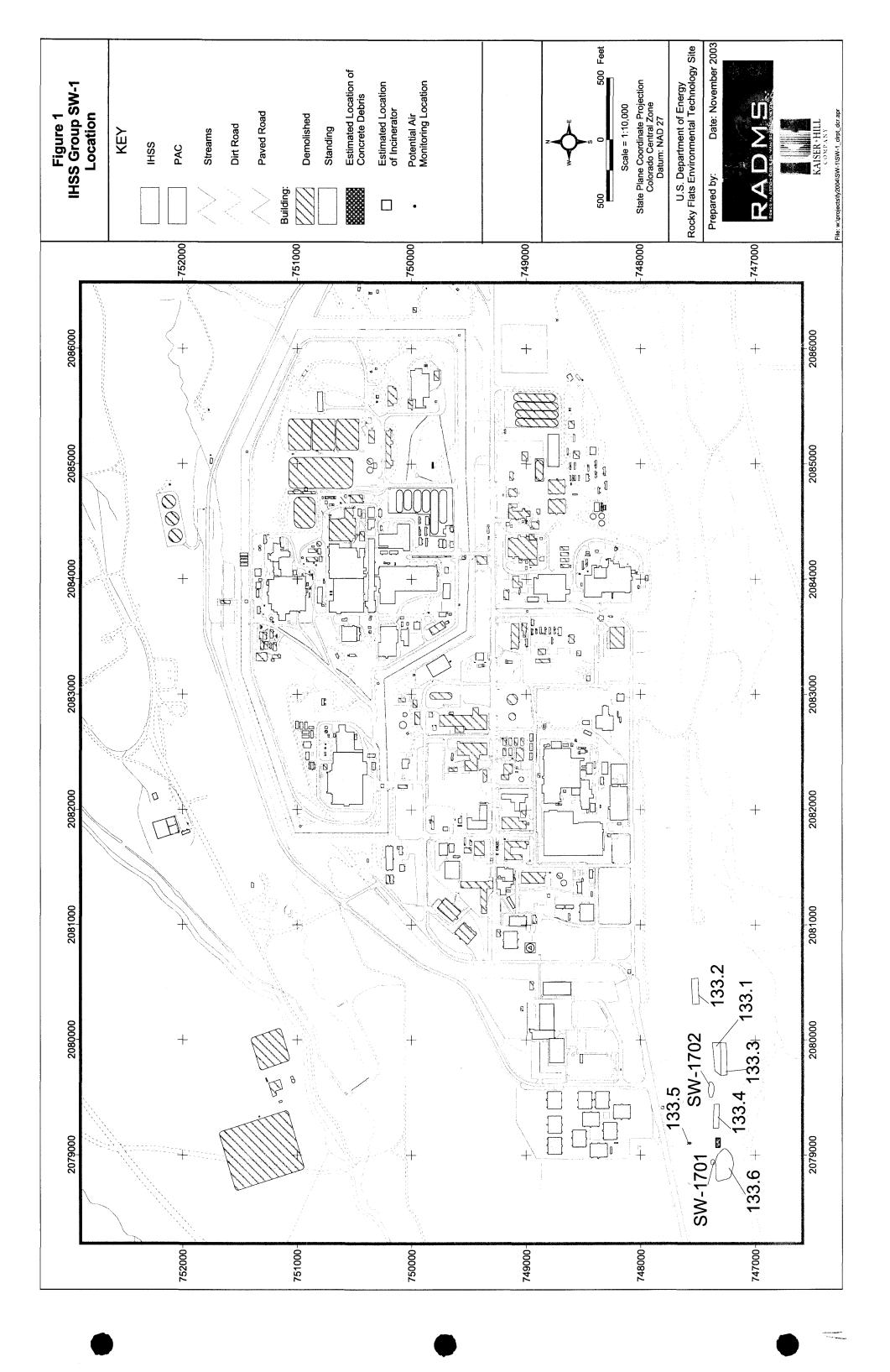
Contact Record Prepared By: Annette Primrose

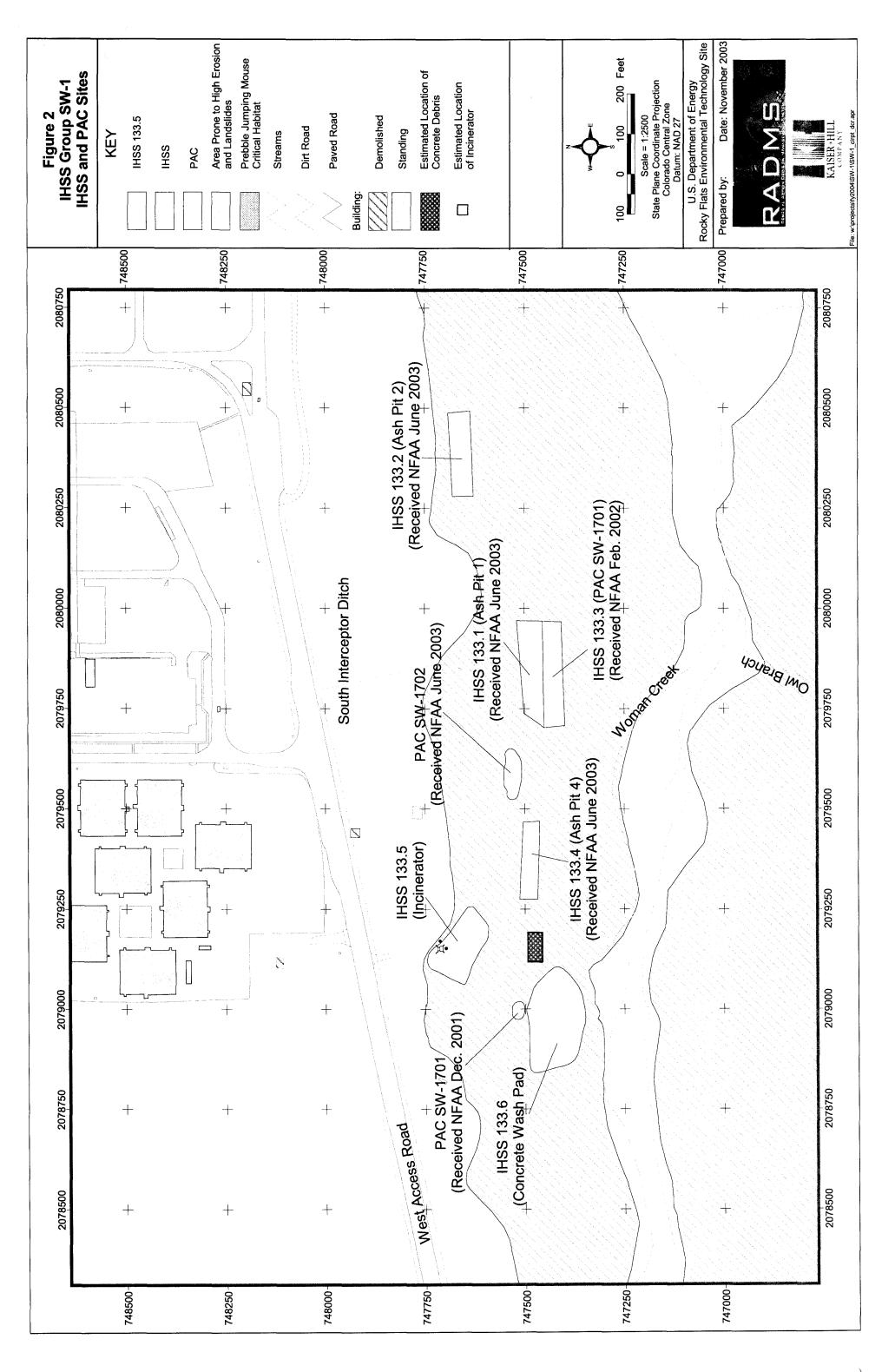
Required Distribution:		Additional Distribution
		(choose names as applicable):
S. Bell, RFFO	D. Mayo, K-H RISS	M. Broussard, K-H RISS
L. Brooks, K-H ESS	J. Mead, K-H ESS	J. Hindman, CDPHE
L. Butler, K-H RISS	S. Nesta, K-H RISS	G. Kleeman, USEPA
C. Deck, K-H Legal	K. North, K-H ESS	D. Kruchek, CDPHE
R. DiSalvo, RFFO	T. Rehder, USEPA	L. Norland, K-H RISS
S. Gunderson, CDPHE	D. Shelton, K-H	A. Primrose, K-H RISS
J. Legare, RFFO	C. Spreng, CDPHE	E. Pottorff, CDPHE
		S. Tower, DOE

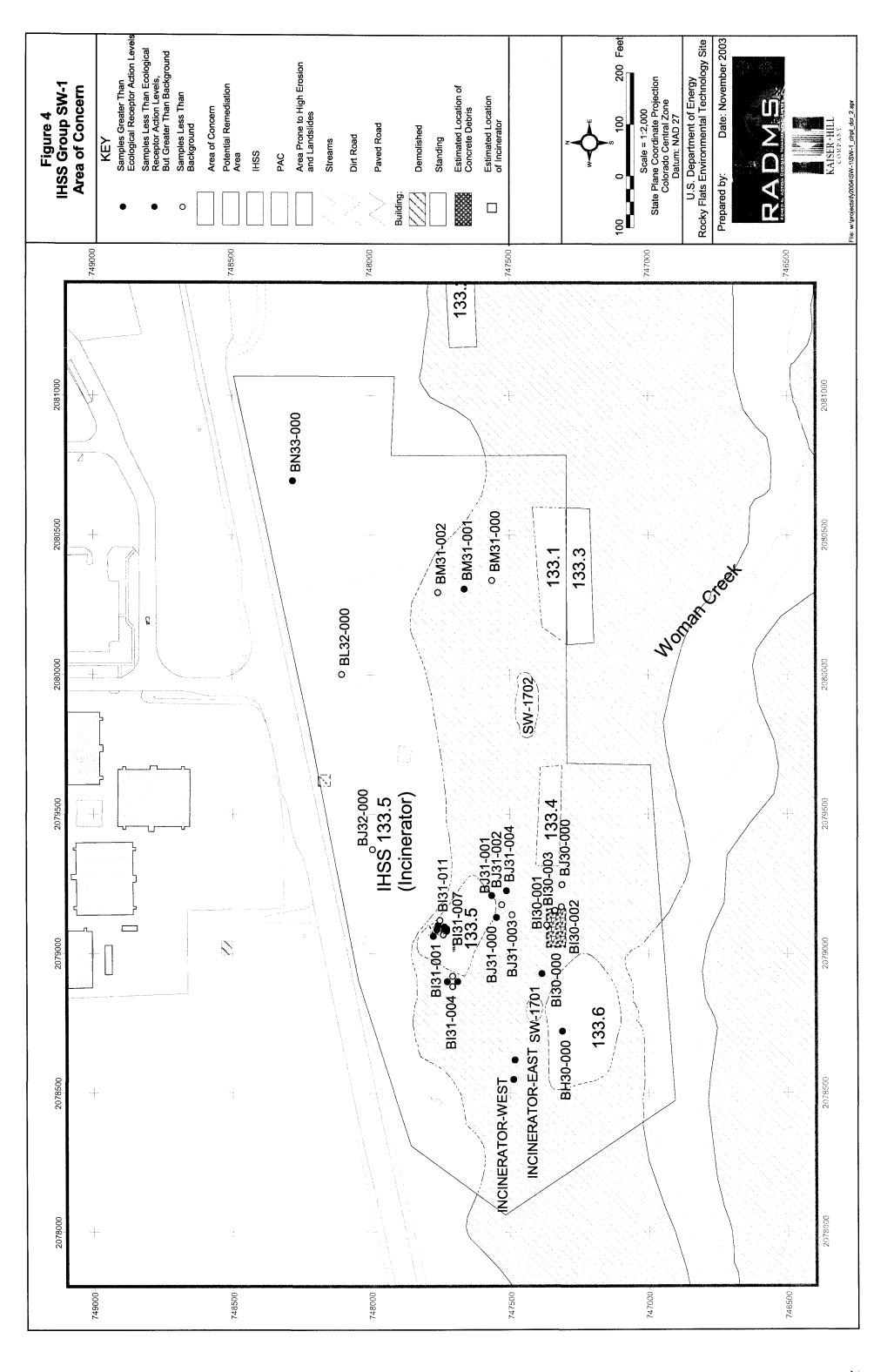
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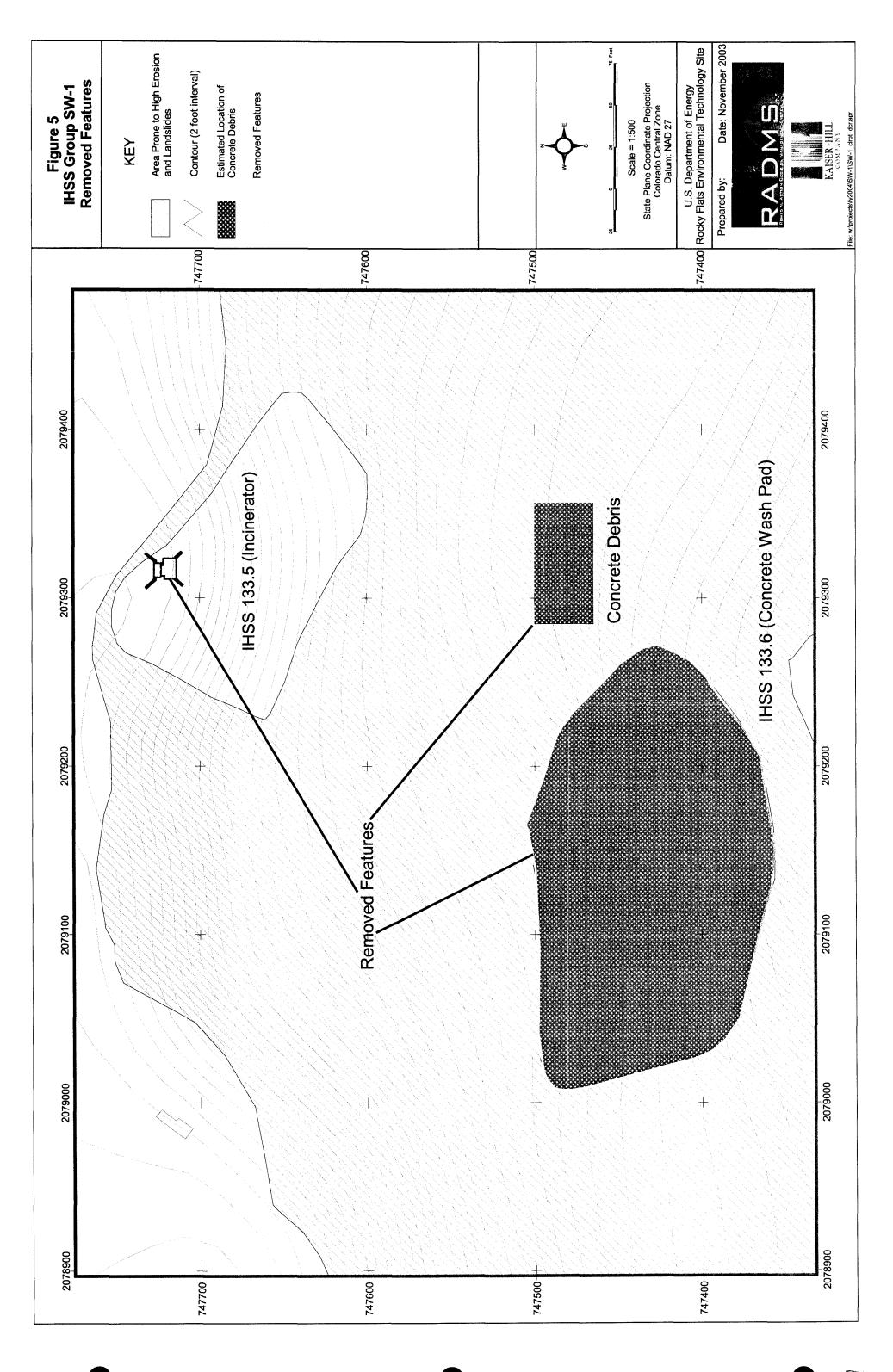
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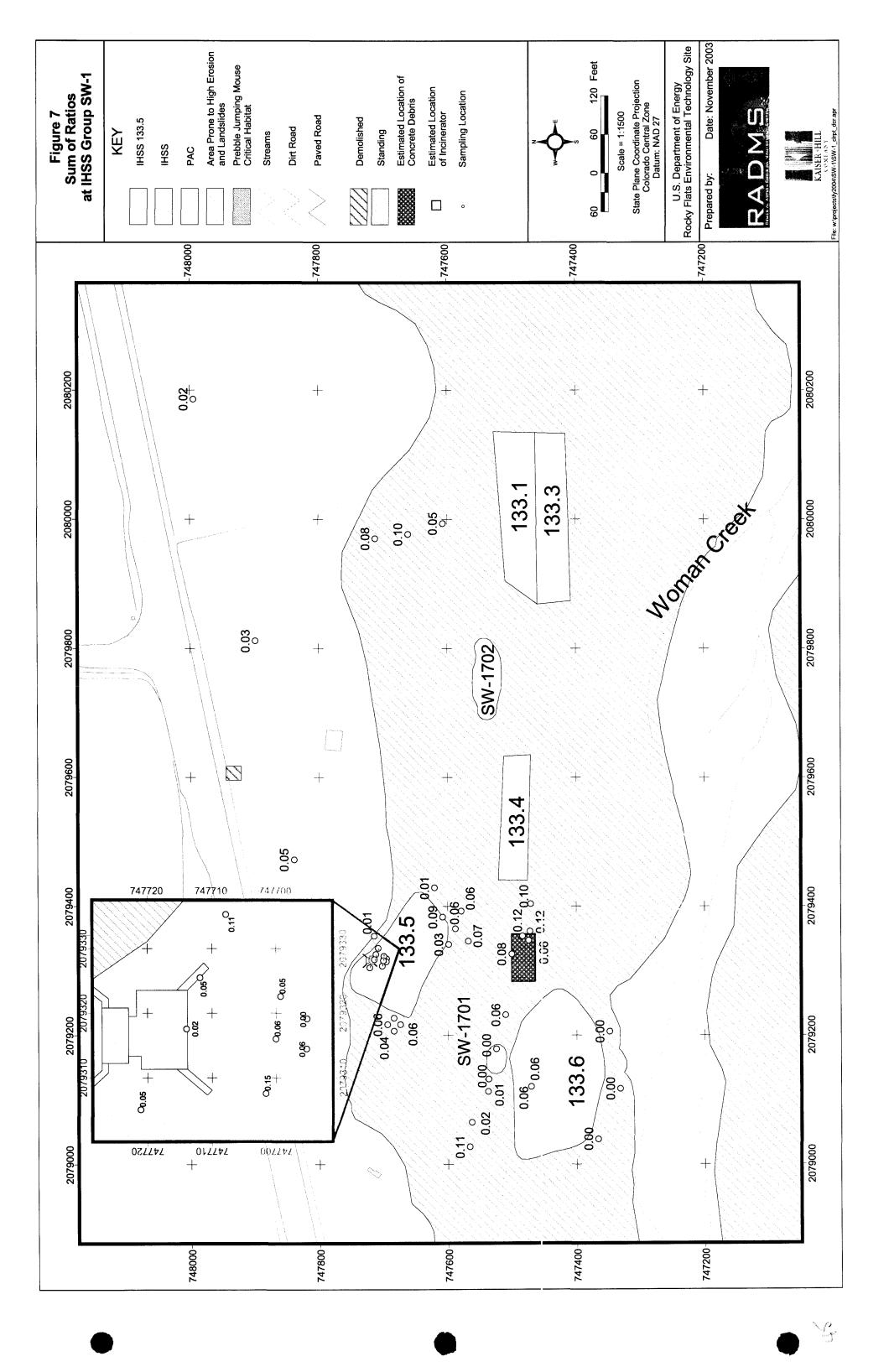


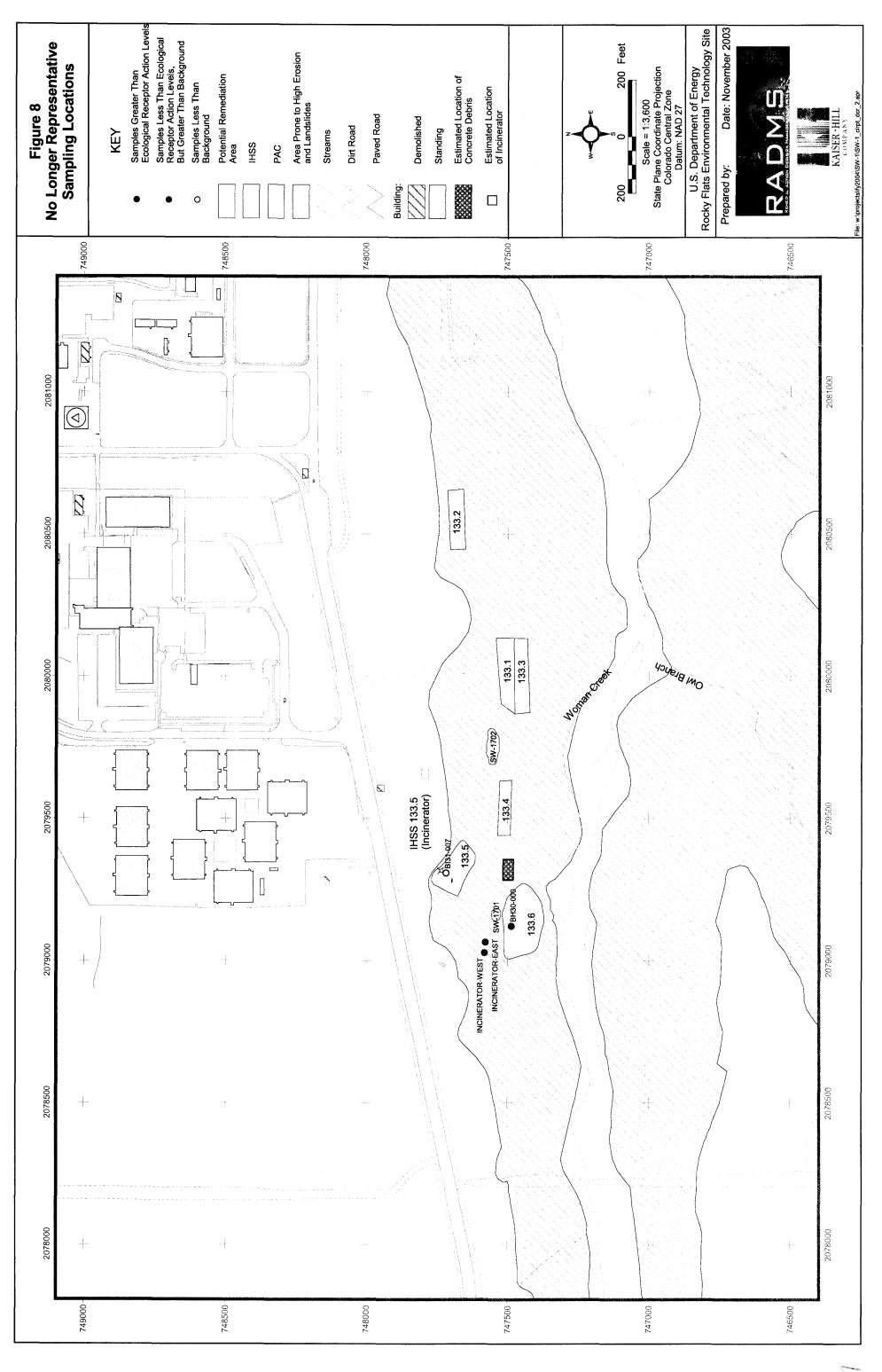


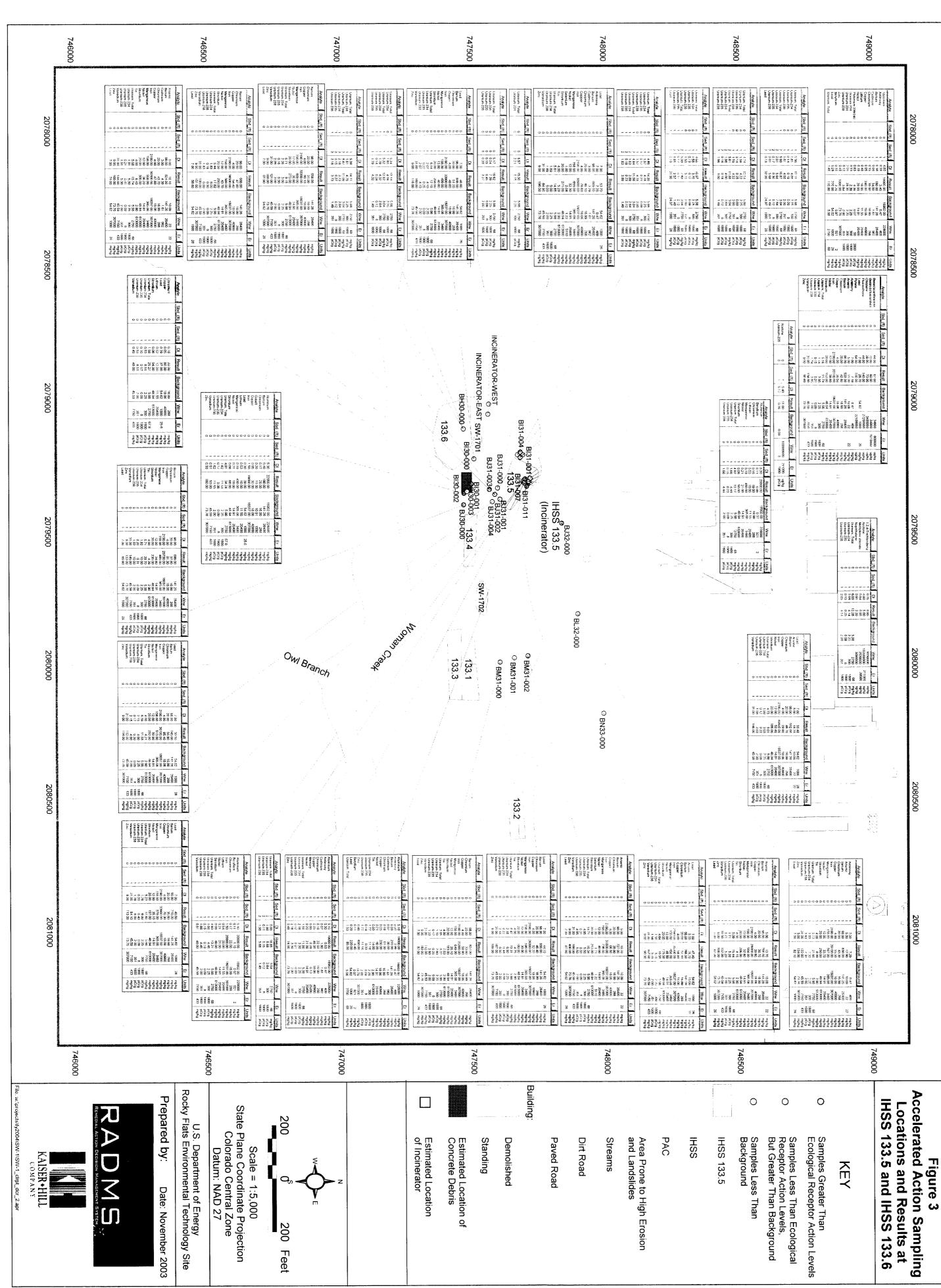












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